Appendix E Electronic Audit Information

Clean Air Markets Division
U.S. EPA
Washington, DC 20014

September 2005

I. Methodology to be Used for Appendix E Audits

EPA will use MDC to perform electronic audits of Appendix E units, beginning in the 1st quarter of 2006. An evaluation of the quality-assured status of emissions data will be performed in the following manner:

- For each unit that uses an Appendix E monitoring system to report quality-assured NO_x emission rate data, we will check to make sure that the unit is a peaking unit.

- For each Appendix E monitoring system used to report quality-assured data, the historical EDR data will be searched, to locate the most recent Appendix E NO_x emission test. This will be done to determine whether the monitoring system is up-to-date with respect to this QA test requirement and therefore "in-control".

In evaluating the hourly data in each quarter, an "out-of-control" status will be assigned whenever the data validation "window" is found to have expired for an Appendix E test. The out-of-control status will continue until a subsequent test is successfully completed. If no subsequent QA test is passed, the monitoring system will be considered to be out-of-control through the end of the quarter.

II. Recommended Procedures to Prepare for the Electronic Audits

The following procedures are recommended to help you to prepare for the electronic audits of Appendix E and/or Appendix D units that will begin in the first quarter of 2006:

- For each Appendix D or E unit, review your records to see when the last valid quality assurance tests were done (i.e., the last fuel flowmeter accuracy test, transmitter calibration, primary element inspection (PEI), or Appendix E NO_x emission test, as applicable). Determine whether these QA tests are active or if they have expired. Use the following guidelines:

    -- Fuel flowmeter accuracy tests (which include transmitter calibrations of orifice-type meters) are required every four calendar quarters, unless the test deadline is extended, either by means of "non-QA" quarters (< 168 hours of fuel combustion) or by using the optional fuel flow-to-load ratio test in section 2.1.7 of Appendix D. Accuracy test deadlines may be extended up to 5 years (20 quarters) from the previous test, with one qualification-- when you use the "QA quarter" approach, the accuracy test is due in the earlier of the fourth QA quarter or the 20th calendar quarter after the previous test.

    -- For orifice, nozzle and venture-type flowmeters, a primary element inspection (PEI) is required every 3 years (12 quarters), unless the deadline is extended (up to a maximum of 20 quarters) using the fuel flow-to-load ratio test.

    -- Appendix E re-tests are required every 5 years (20 quarters), and whenever the monitored QA parameters are not within acceptable ranges (as indicated by a

parameter status flag of "N" in EDR record 323 or 324) for > 16 consecutive unit operating hours.

- If you believe that you are up-to-date with respect to all of the required QA tests, examine your historical EDR data, to be sure that you have, at a minimum, reported the results of the most recent QA tests and (if applicable) have reported all of the necessary test deadline extension claims. Here are some important "check points" regarding the fuel flow-to-load ratio test:

  -- You must report flow-to-load test results (EDR records 629 and 630) every "QA quarter," for as long as you intend to claim extensions of your accuracy test deadline. Once you stop reporting the fuel flow to load test, you may not resume reporting it until you perform another accuracy test, unless you have inadvertently omitted the test results in one or more EDRs. In that case, you may submit the missing records without adverse consequences.

  -- If you have an orifice, nozzle or venturi-type flowmeter that conforms to AGA Report No. 3, you must perform a complete QA sequence within the same calendar quarter before you can use the fuel flow-to-load methodology (Appendix D, section 2.1.7.1(a)). A complete QA sequence consists of transmitter calibrations plus a primary element inspection.

- If you believe that you have reported (or are prepared to report) all of the essential QA test results and extension claims, you can proceed with verifying that you pass the new MDC Hourly Appendix D Status evaluation. To do this, you must ensure that your local MDC database has been populated with all of the necessary data. In addition to QA test and extension data, you must also import or enter up to five years of quarterly operating hour and fuel operating hour data. To do this, follow these steps:

  -- First, obtain the MDC CAMD Export file for your facility. These files can be accessed from the CAMD website MDC page at http://www.epa.gov/airmarkets/monitoring/mdc/extracts2/index.html
  The MDC CAMD Export Files contain all monitoring plan, QA test data and Extensions/Exemption data that have been submitted for each facility. In addition, these files contain quarterly operating hour totals and quarterly fuel hour totals for the last five years, provided in RT 980 and 981. (These RTs were created solely for inclusion in MDC CAMD Export files to be imported into local MDC installations.)

  -- Next, backup your local MDC database and then delete the existing data for the facility.

  -- Then, import the MDC CAMD Export file. This will recreate EPA's version of your data as of the date of the MDC CAMD file. Finally, if you have submitted (or intend to submit) any updates or additional data since that date, import the applicable files. If this includes any prior quarters of data, be sure to import from a complete quarterly file so that the quarterly fuel hours data can be updated from RTs 302 and 303 (which will occur during the import.)

- Now that your local MDC database includes all the required data, use the Hourly module of MDC beta version 4.2.53 to check the QA status of your Appendix D and E monitoring systems.

- If you receive an MDC QA status report showing an "out-of-control" status for any of your monitoring systems, the following actions are recommended:

  -- First, diagnose the problem. Determine whether the monitoring system is actually out-of-control, or whether the out-of-control status resulted from improper reporting of the accuracy test, PEI or appendix E test information.

  -- If you conclude that a QA test has expired and the monitoring system is actually out-of-control, you should perform the necessary accuracy test, PEI or Appendix E test, to get back in-control as soon as possible.

  -- If you find that the monitoring system is not out-of-control, but the apparent out-of-control status is the result of improper or incomplete data reporting, then:

    (1) Identify the specific reporting deficiencies; and

    (2) Take corrective actions by December 31, 2005, as follows:

      -- If the reporting problems responsible for the out-of-control status are directly traceable to the most recent quarterly report, make the necessary corrections and resubmit that report.

      -- If the out-of-control status is triggered by improperly reported data or incomplete data in earlier EDRs (possibly going back to previous years), it is not necessary to resubmit all of the past reports. Rather, you should either resubmit the most recent EDR, including in it all of the missing and corrected data, or submit the missing and corrected information in your next EDR.

  -- If you believe that the MDC evaluation of the QA status is in error for a particular unit or stack, or that there is a "bug" in the MDC, please contact Kim Nguyen at 202-343-9102, or nguyen.kim@epa.gov.

- You can use the "Edit" mode of MDC to create missing QA records or to edit existing records. You can then export the records and use a text editor to add them to your EDR. An example of how to use the Edit mode to create and export QA records is given in Section III, below.

III. Example: Reporting Appendix E Test Data

Background

At our "Appendix D and E" facility (ORIS code 1), we have a combustion turbine, Unit CT01, that is in the Acid Rain Program. The turbine meets the definition of a "peaking unit", under 40 CFR Part 72. We burn mainly natural gas in CT01, and occasionally fire diesel oil. There are no CEM systems on CT01. We use the "excepted" methodologies in Appendices D, E, and G of Part 75 to account for Unit CT01's SO_2, NO_x, and CO_2 emissions. Unit CT01 has two certified Appendix D fuel flowmeter systems, one for oil (system ID # OS1) and one for gas (system ID # GS1).

Unit CT01 first came on line in the 2nd quarter of 2000. At that time, we did all of the tests required by Appendix D to certify the fuel flowmeters. We also conducted the four-load NO_x emission testing required by Appendix E, in order to construct correlation curves of NO_x emission rate versus heat input rate. We derived separate correlation curves for natural gas combustion and oil combustion and programmed them into our DAHS. In our monitoring plan, they are represented as two separate Appendix E monitoring systems, with ID numbers of "NX1" (for natural gas) and "NX2" (for oil).

Appendix E testing is required once every five years (20 calendar quarters). Since our initial testing was done in the 2nd quarter of 2000, the deadline for re-testing was the end of the 2nd quarter of 2005 (i.e., 6/30/05). We re-tested CT01 in March, 2005, one quarter before the deadline.

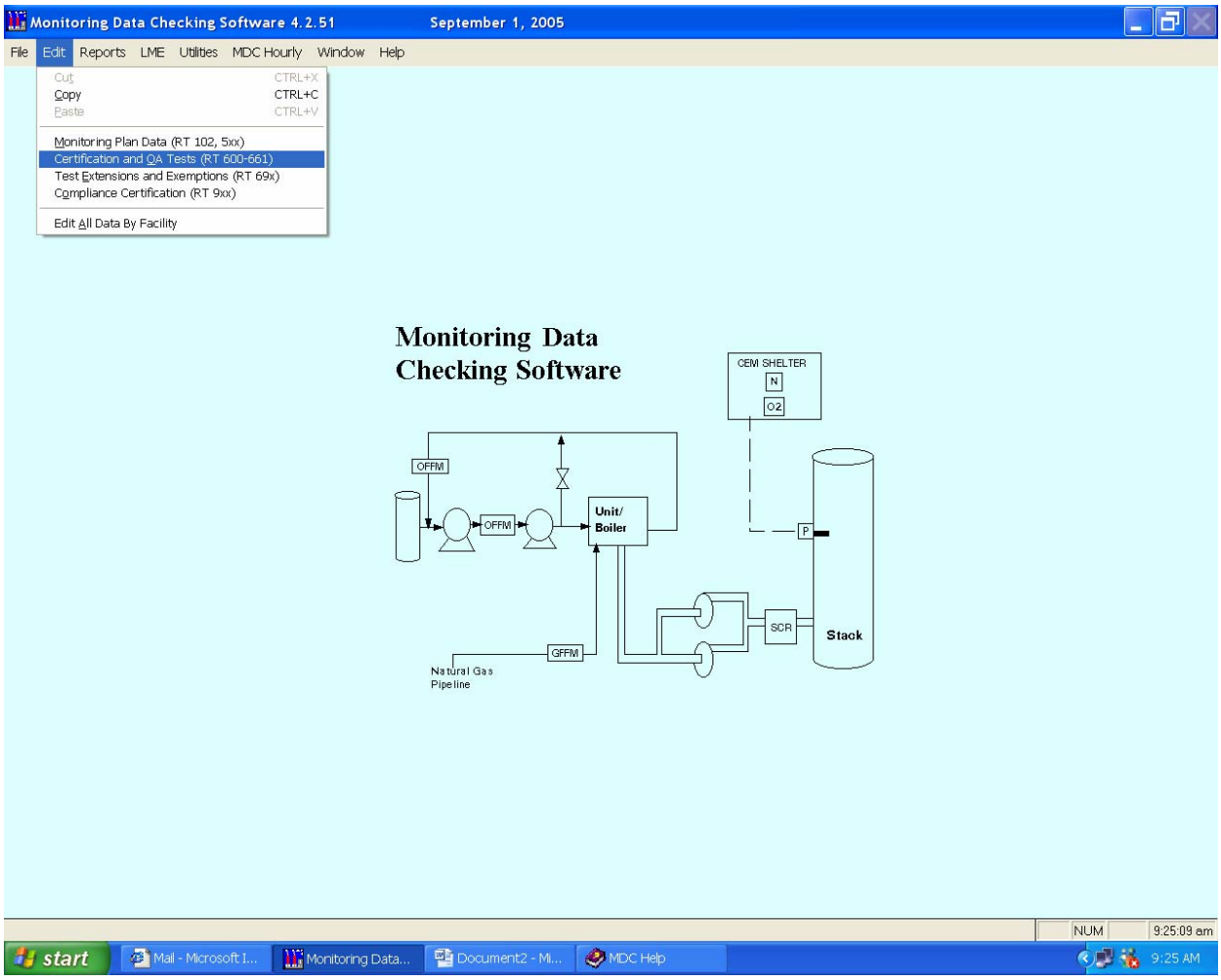
Recently, during an in-house audit of our Part 75 electronic data reports (EDRs) for 2005, we discovered that we had neglected to report the results of our 1st quarter, 2005 Appendix E re-tests to EPA.

We contacted the Clean Air Markets Division (CAMD) and were advised that we could either report the missing QA test records in our next (3rd quarter, 2005) EDR report, or we could resubmit the 1st and 2nd quarter EDRs and include the test results in the 1st quarter report. We read through the EDR Reporting Instructions and determined that we would need to generate the following five EDR record types to straighten out our Appendix E QA history:

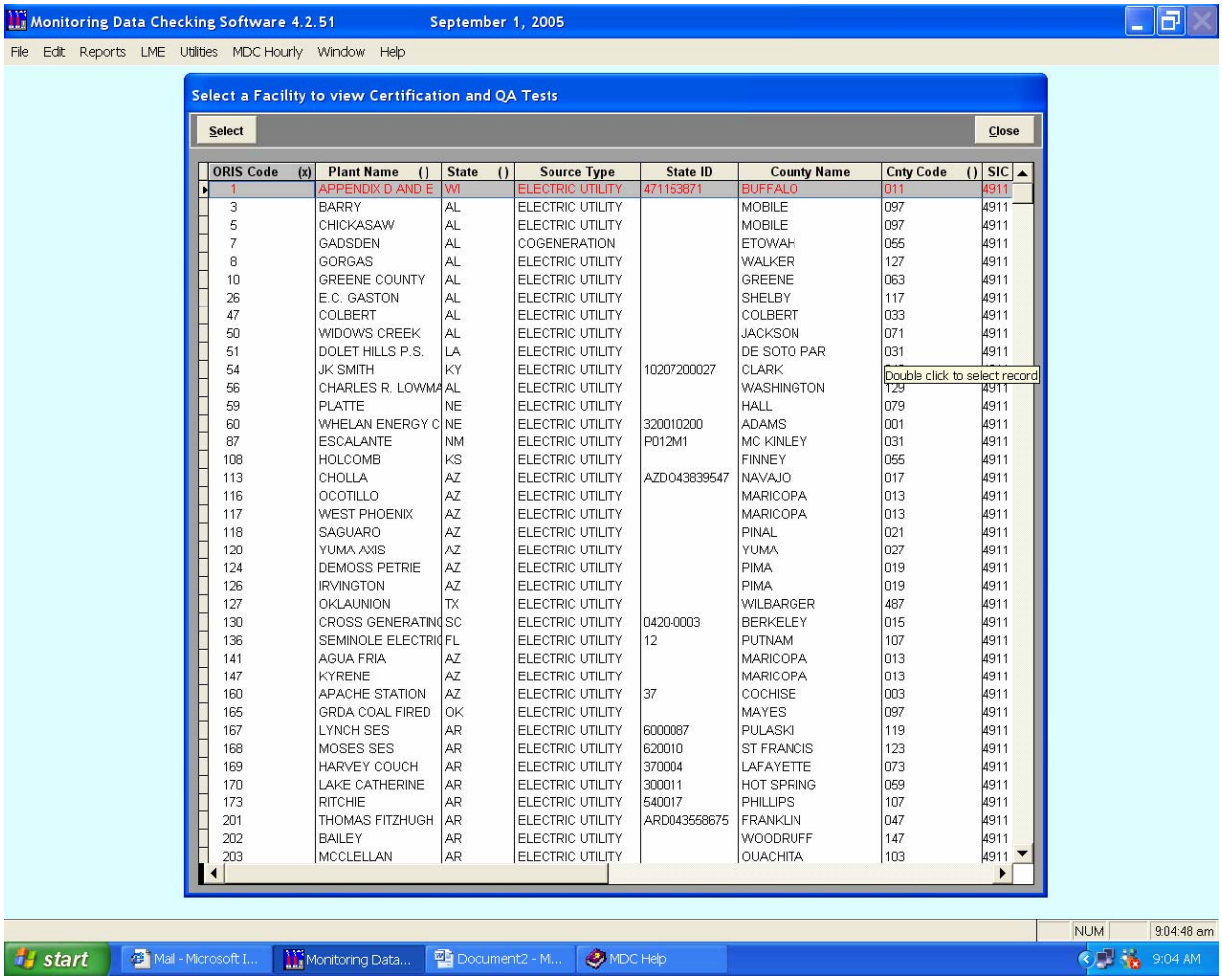
- RT 650, to report the results of the individual Appendix E test runs;
- RT 651, to summarize the test results at each load level;
- RT 652, to report the heat input information for the oil test; and
- RT 653, to report the heat input information for the natural gas test.
- RT 560, to report the correlation curve segments.

We decided to create the necessary records using MDC and then add them to our 3rd quarter, 2005 EDR report. The following series of screens shows how we used MDC to create the missing QA records for the Appendix E re-test on natural gas.

In order to access data entry screens for record types 650, 651, and 653, which are required for the natural gas re-test, we began by selecting the "Certification and QA Tests" option in the "Edit" mode on the main menu of MDC, as shown below.



Next, we selected the "Appendix D and E" facility by double clicking on it. The "Select a Test for Appendix D and E" screen appeared.



ORIS Code (x)	Plant Name ()	State ()	Source Type	State ID	County Name	Cnty Code ()	SIC
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7	GADSDEN	AL	COGENERATION		ETOWAH	055	4911
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50	WIDOWS CREEK	AL	ELECTRIC UTILITY		JACKSON	071	4911
51	DOLET HILLS P.S.	LA	ELECTRIC UTILITY		DE SOTO PAR	031	4911
54	JK SMITH	KY	ELECTRIC UTILITY	10207200027	CLARK		
56	CHARLES R. LOWMA	AL	ELECTRIC UTILITY		WASHINGTON	129	4911
59	PLATTE	NE	ELECTRIC UTILITY		HALL	079	4911
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87	ESCALANTE	NM	ELECTRIC UTILITY	P012M1	MC KINLEY	031	4911
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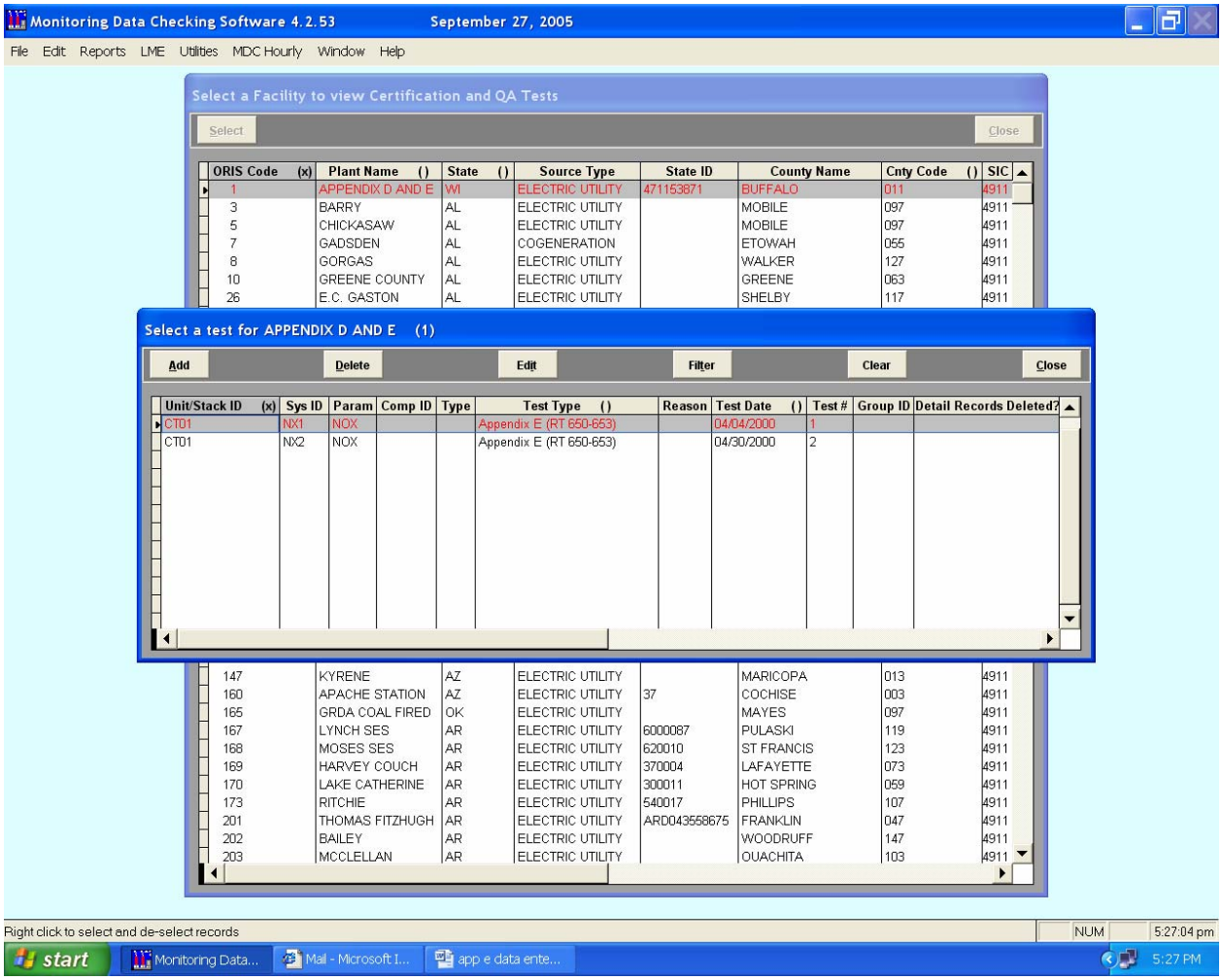
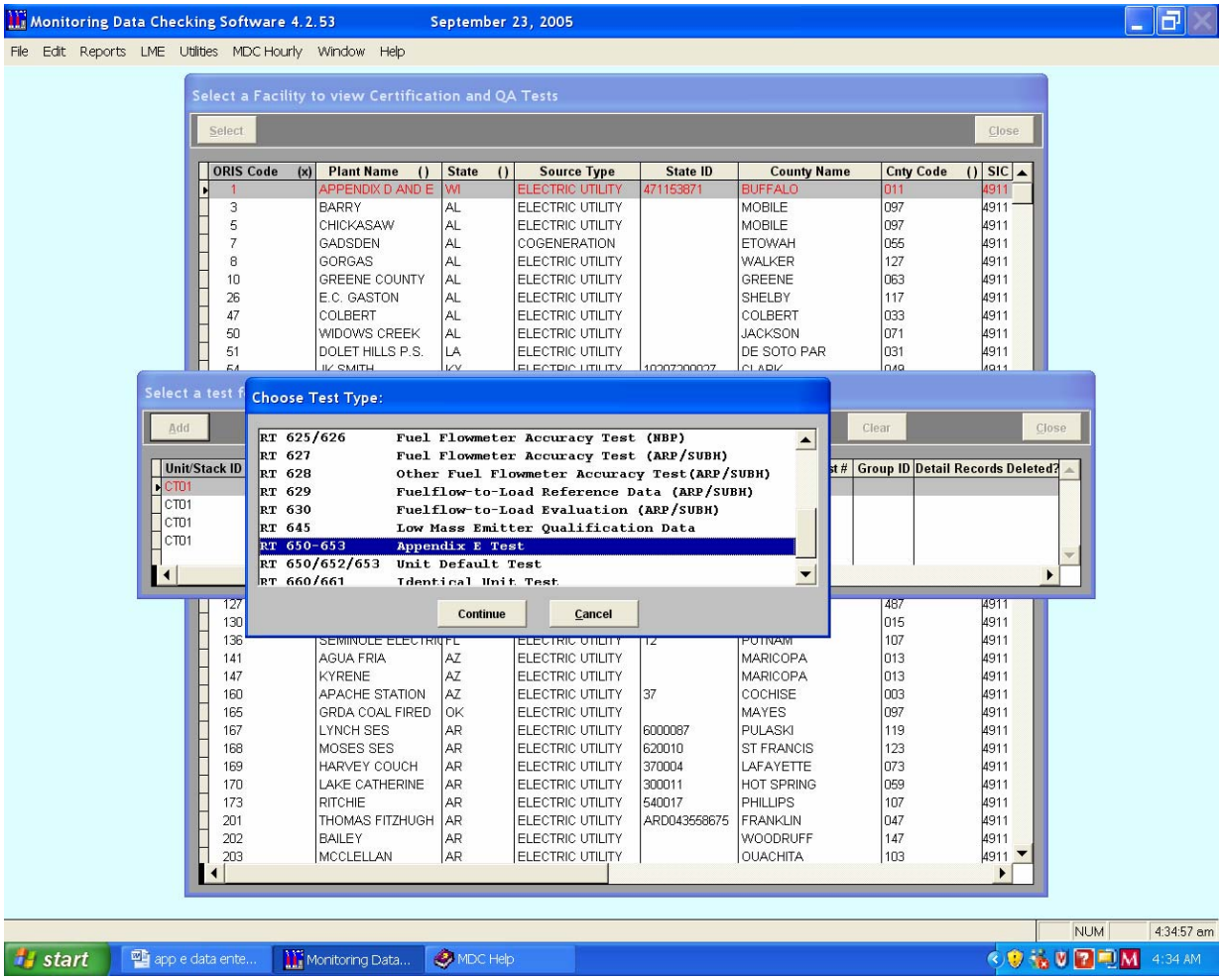
203	MCCLELLAN	AR	ELECTRIC UTILITY		OUACHITA	103	4911

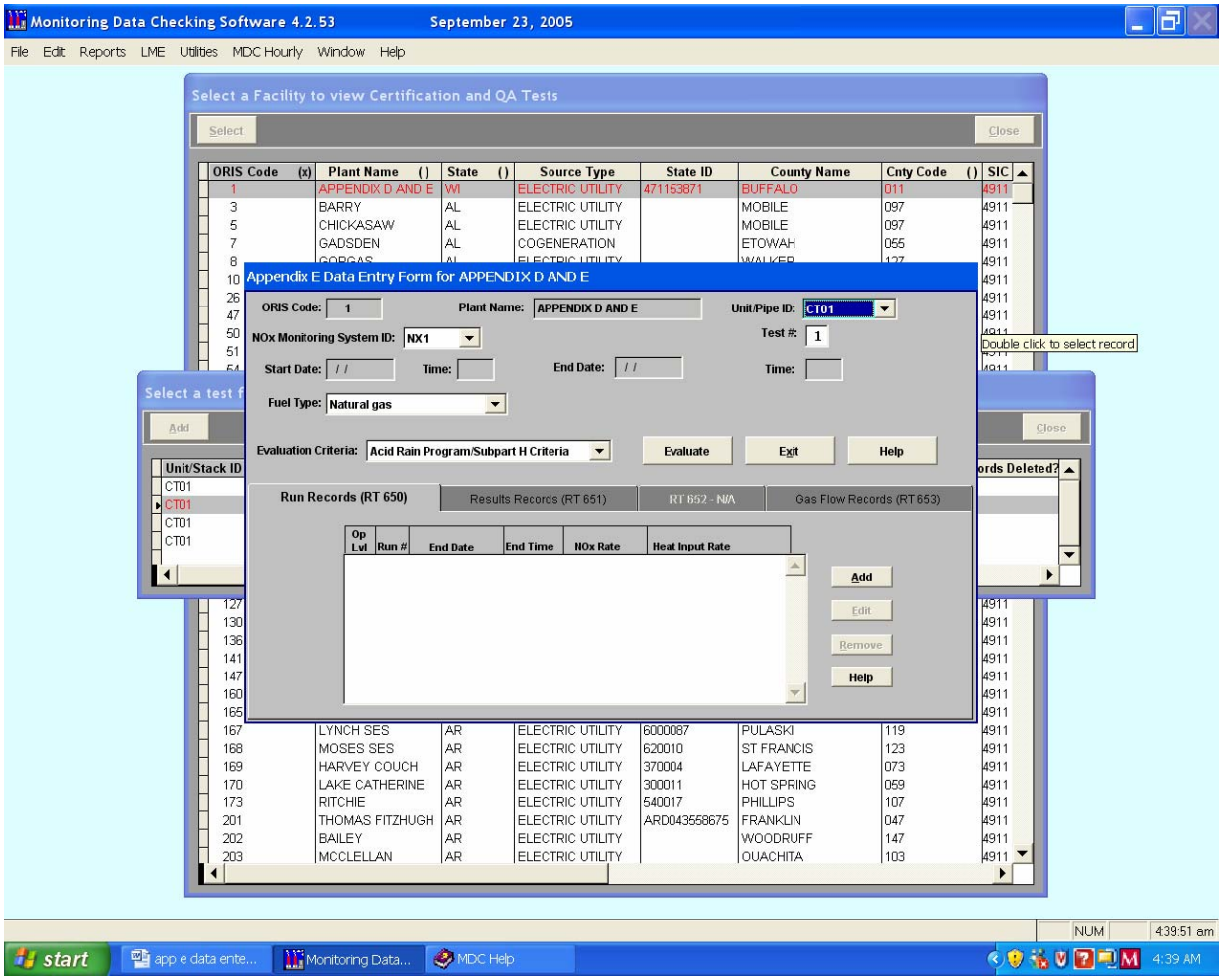
The "Select a Test for Appendix D and E" screen allows you to edit or delete an existing QA Test for a facility, or to add a new QA Test. In our case, since the results of the March, 2005 Appendix E re-test of system NX1 were not in our MDC database (the screen below shows only the initial test from 2000), we needed to use the "Add" function. First, we created the 650 records for the individual test runs. We began by clicking on the "Add" button. The "Choose Test Type" window appeared.



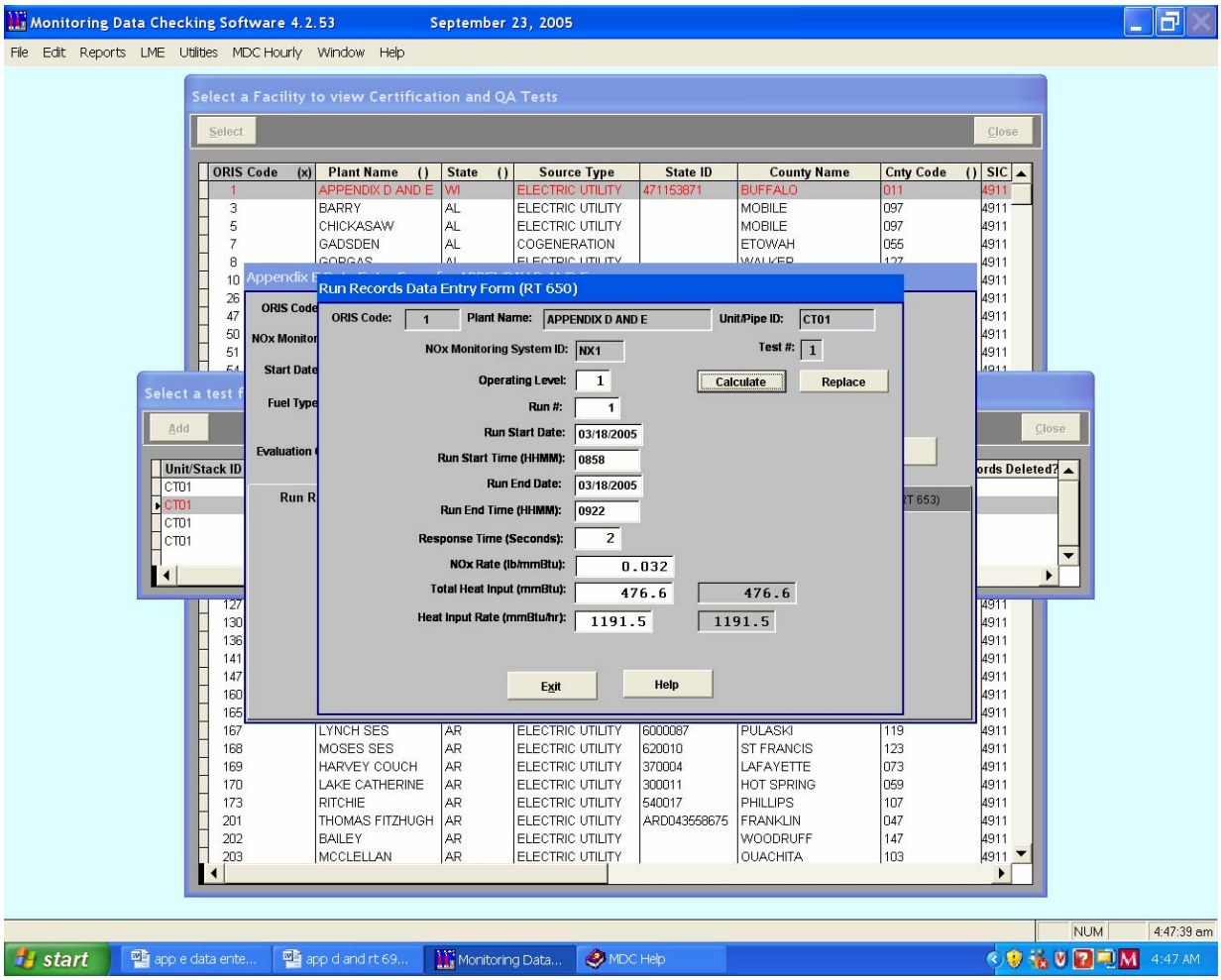
We selected "RT 650-653 (Appendix E Test)" and clicked on the "Continue" button. The Appendix E data entry form then appeared.



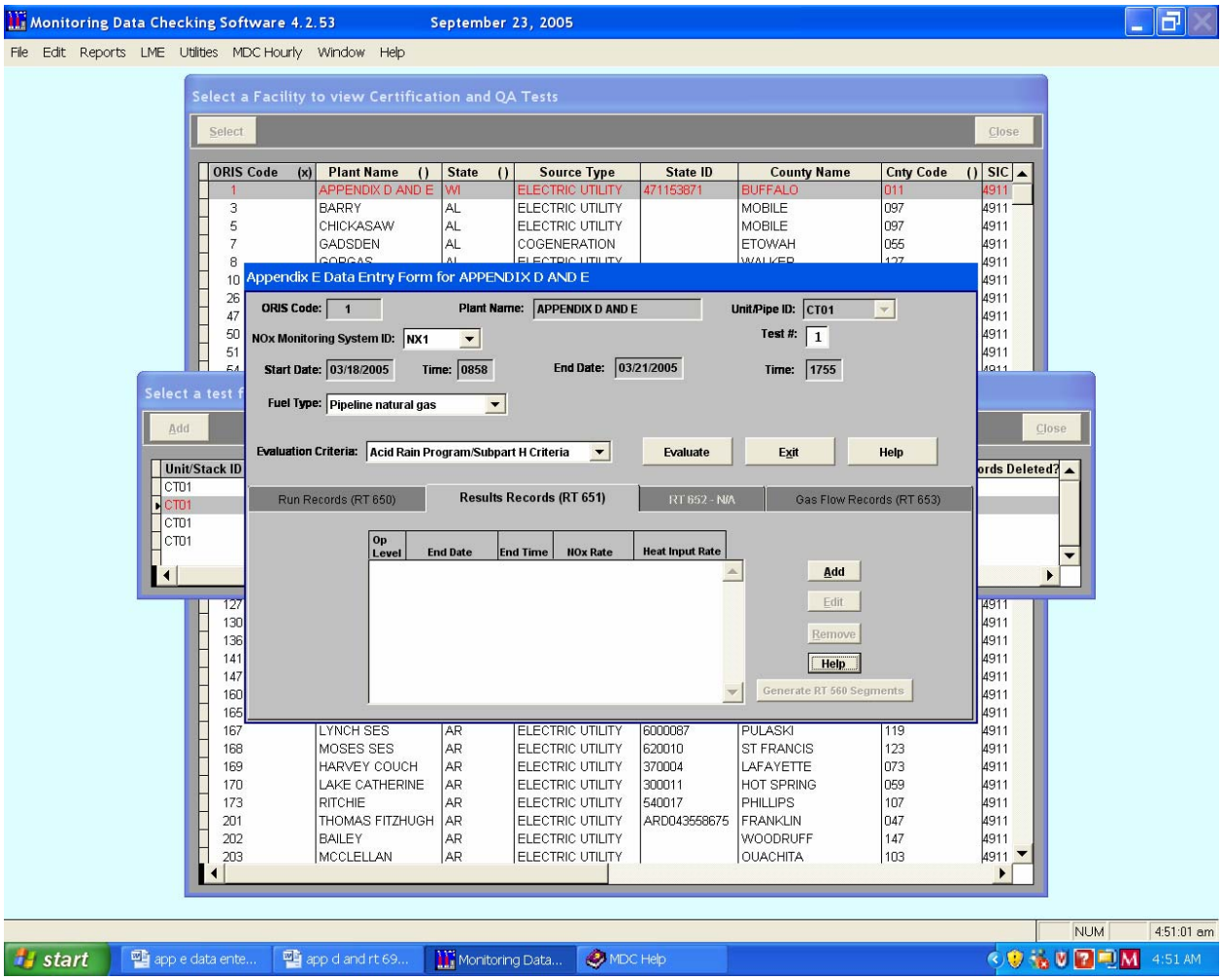
We selected the "Run Records (RT 650)" tab and pressed the "Add" button to enter the data for the first test run.



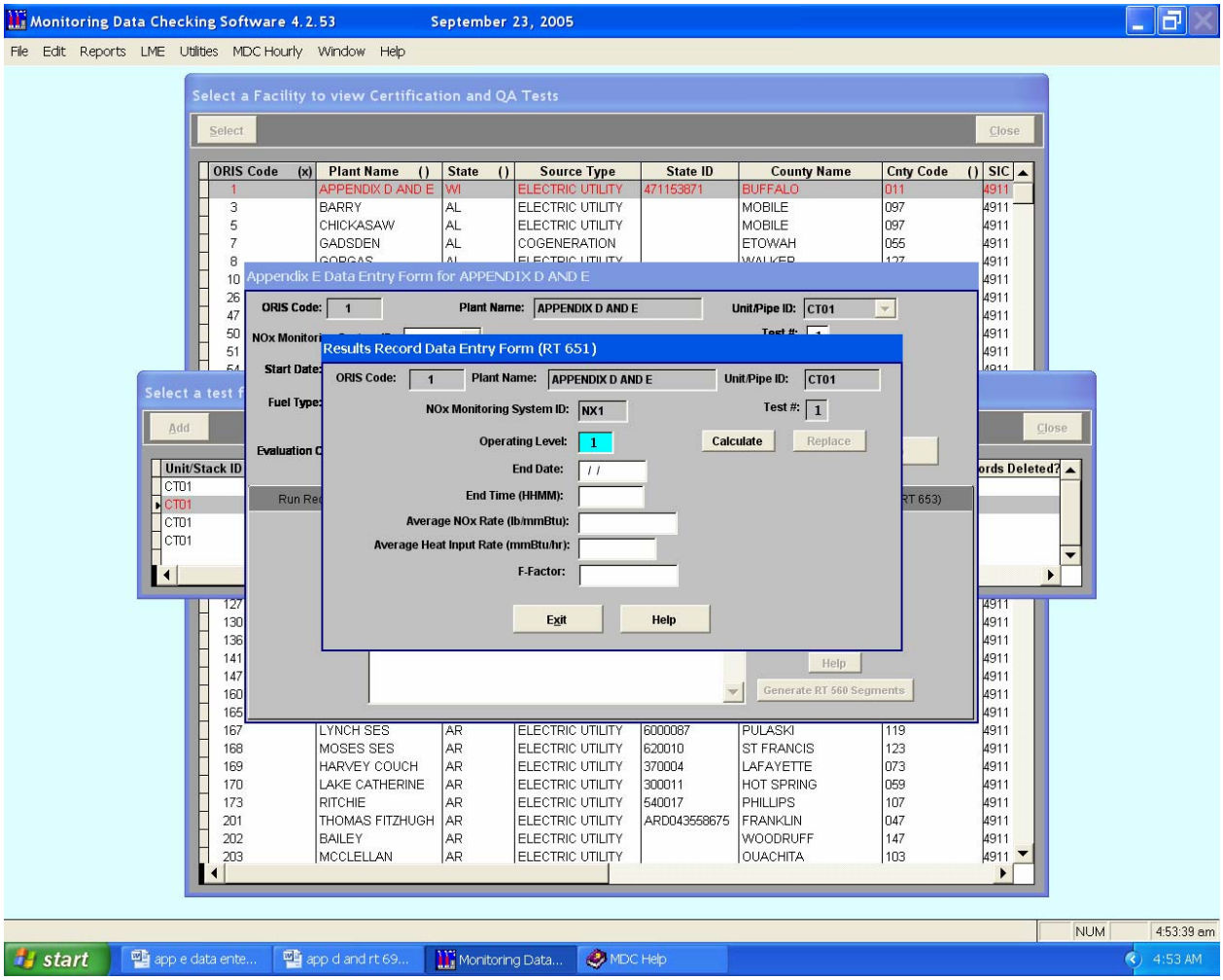
The screen below displays the data for the first test run at Operating Level 1. We pressed the "Calculate" button to compare our reported total heat input and heat input rate values to the values recalculated by MDC. For this run, the recalculated MDC values were identical to ours (see below). However, if our values had been in error, we could have pressed the "Replace" button to correct them. After we were satisfied that the data for Run # 1 were correct, we saved it. We repeated the data entry steps for the rest of the test runs until all twelve runs of the test (i.e., four load levels with three runs each) had been entered.



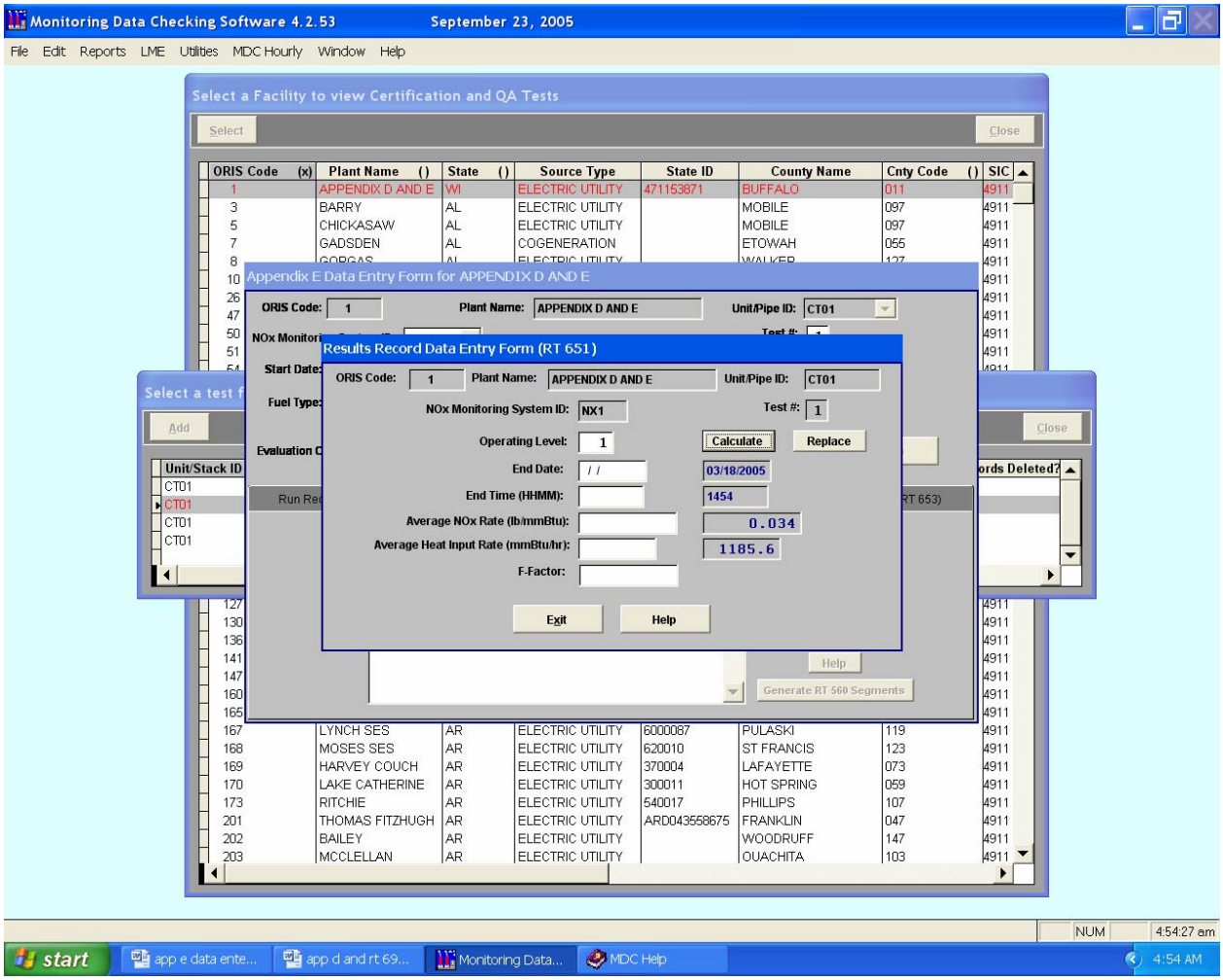
Next, we used MDC to generate the four RTs 651, summarizing the test results at each of the load levels. To do this, we selected the "Results Records (RT 651)" tab on the Appendix E data entry form and pressed the "Add" button.



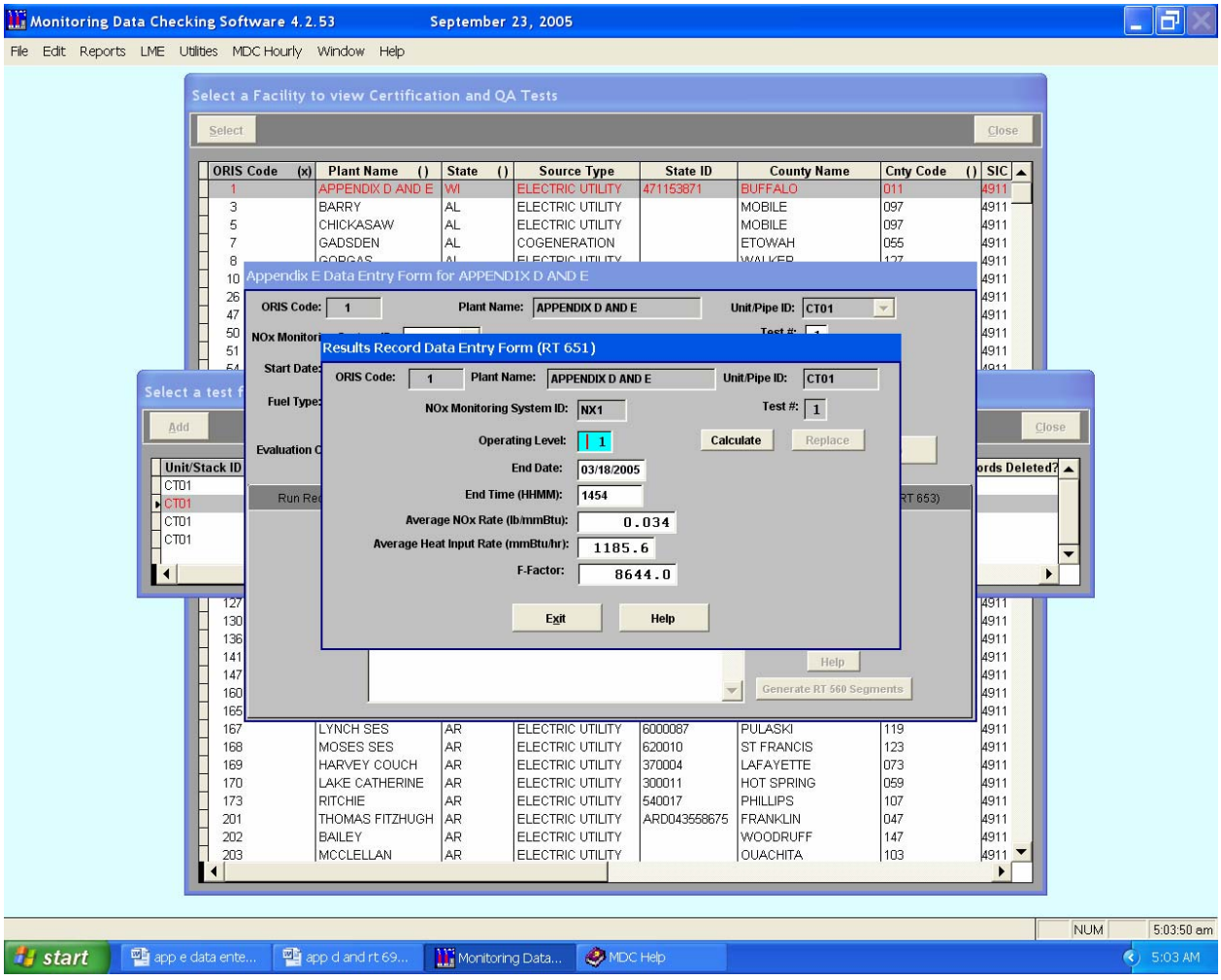
We entered the Operating Level (see below), and then we had a choice of either filling out the rest of the RT 651 information (based on our calculations) or allowing the software to generate the RT 651 data automatically. We decided to let MDC generate the RT 651 data, and pressed the "Calculate" button.



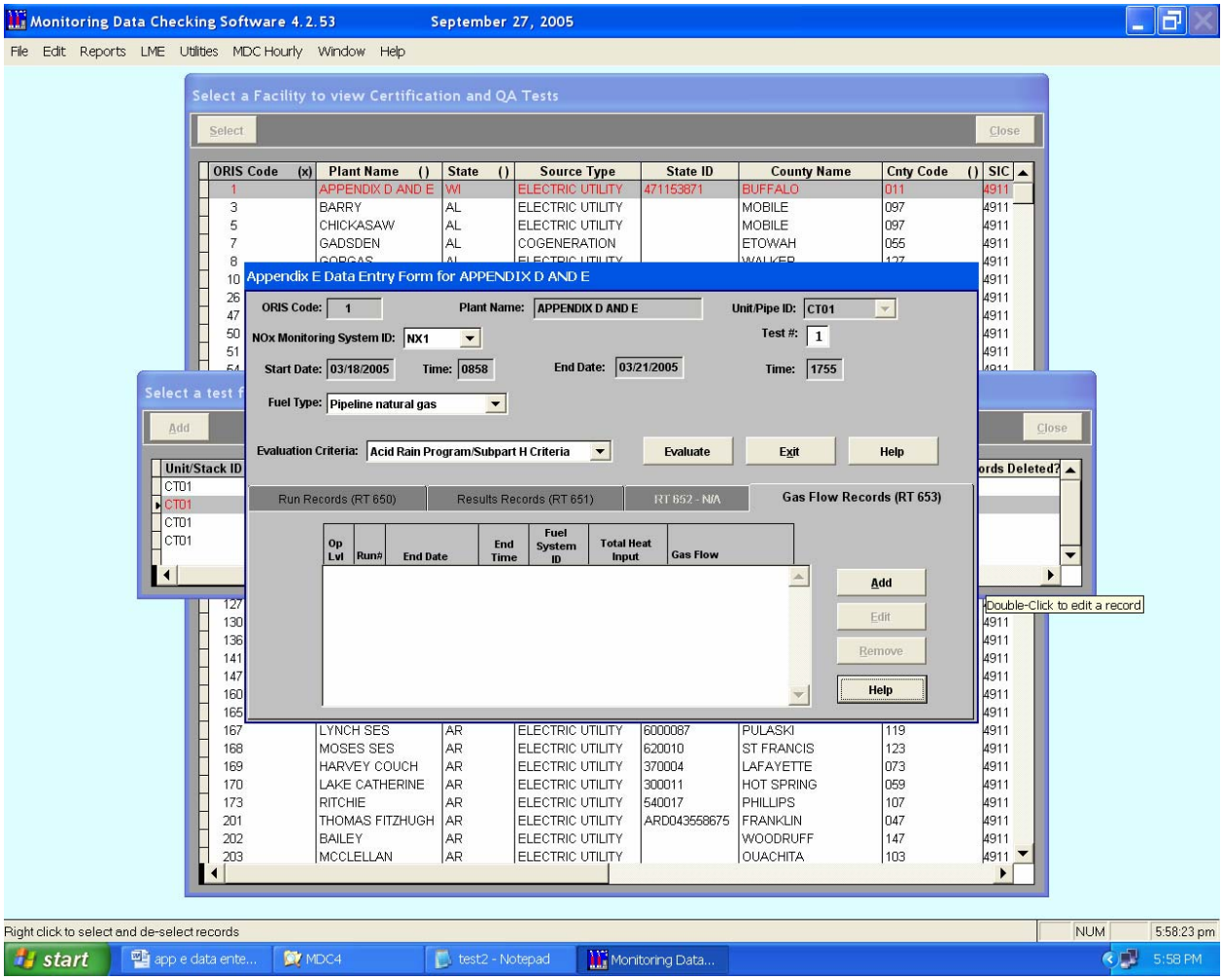
Based on the RT 650 information, MDC calculated and displayed the RT 651 summarized test results (see test results for Operating Level 1, below).



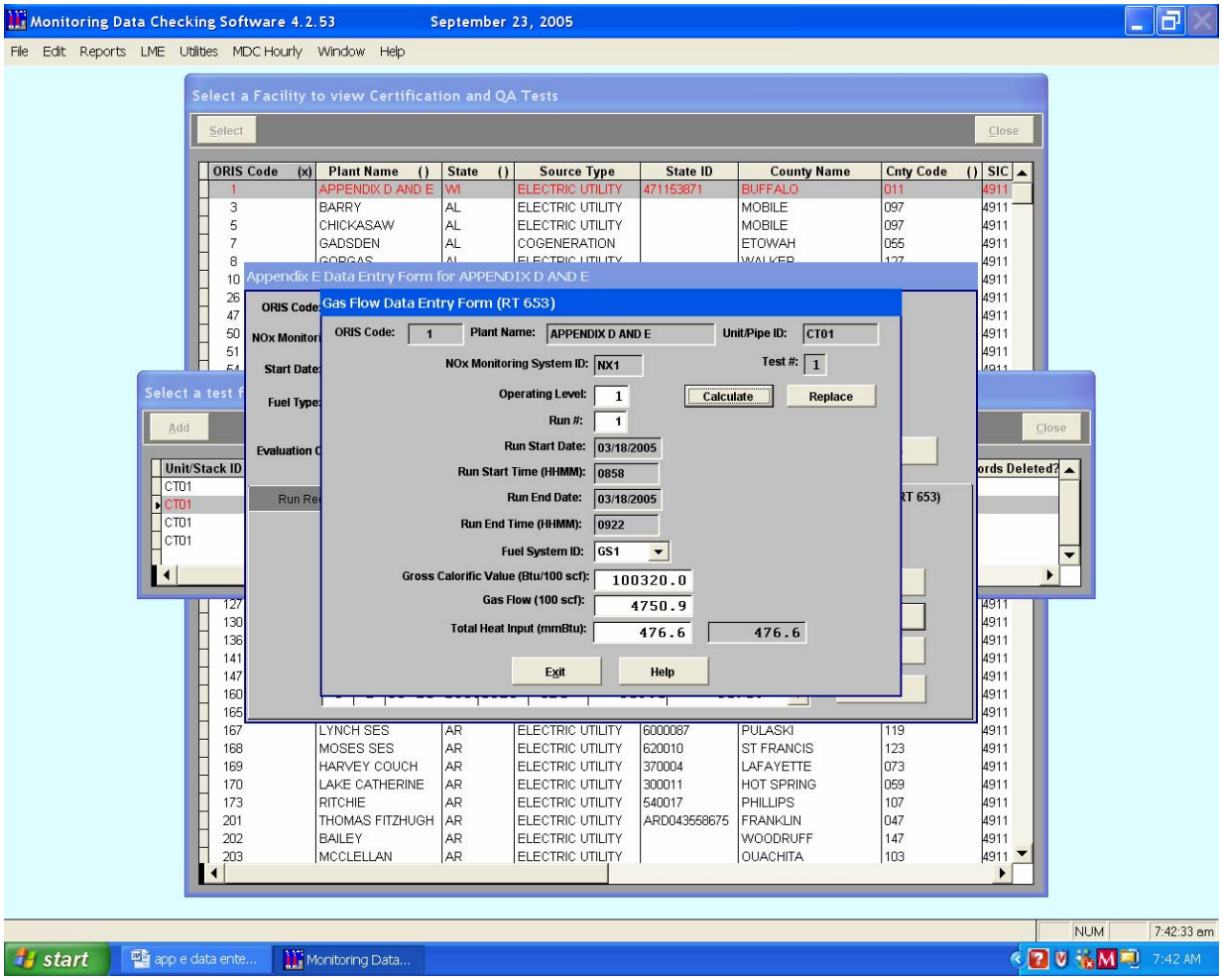
We then pressed the "Replace" button, and MDC entered the test results into the RT 651data entry form, as shown below. Finally, we completed the RT 651 form by entering the F-Factor for the test. Then we pressed the "Exit" button, and saved the data. We repeated the same RT 651 data entry procedures for Operating Levels 2, 3 and 4.



Next, we selected the "Gas Flow Records (RT 653)" tab on the Appendix E data entry form. We pressed the "Add" button and the RT 653 data entry screen appeared.

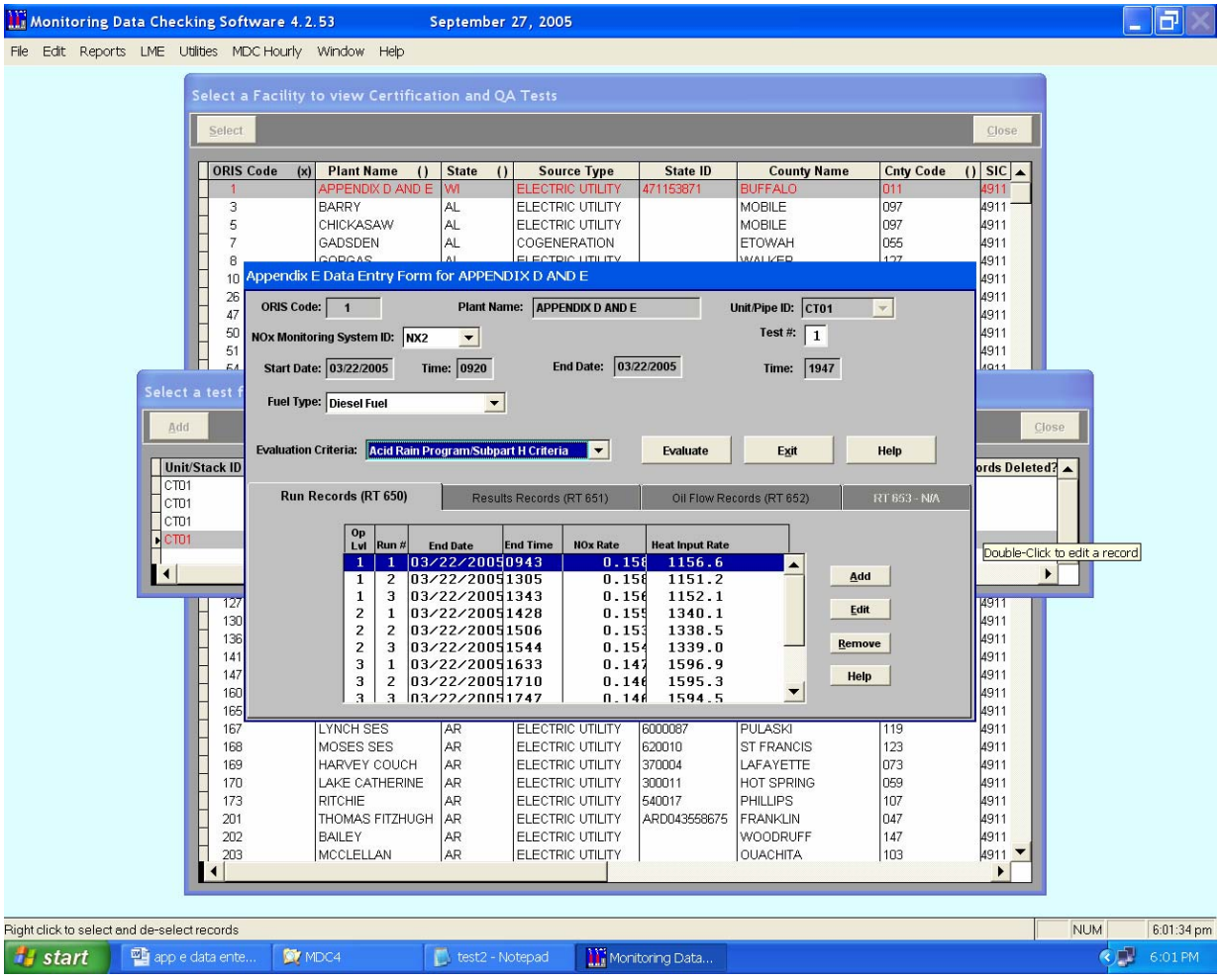


We entered the gas flow data for the first run at Operating Level 1 (see below). We pressed the "Calculate" button to make sure that our total heat input calculation was correct.

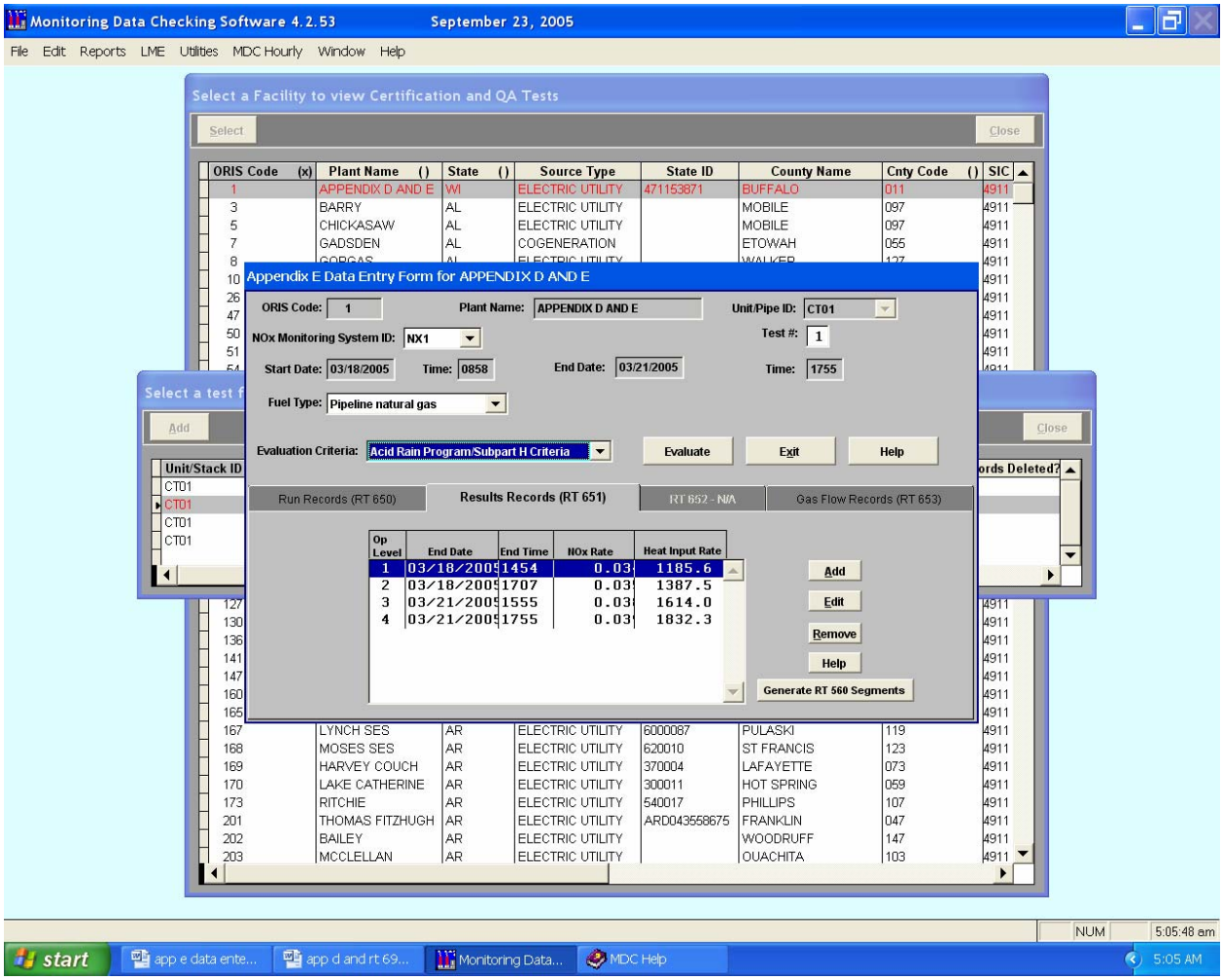


We then entered the gas flow data for the other 11 runs, checking our calculations and replacing incorrect heat input values, as necessary.

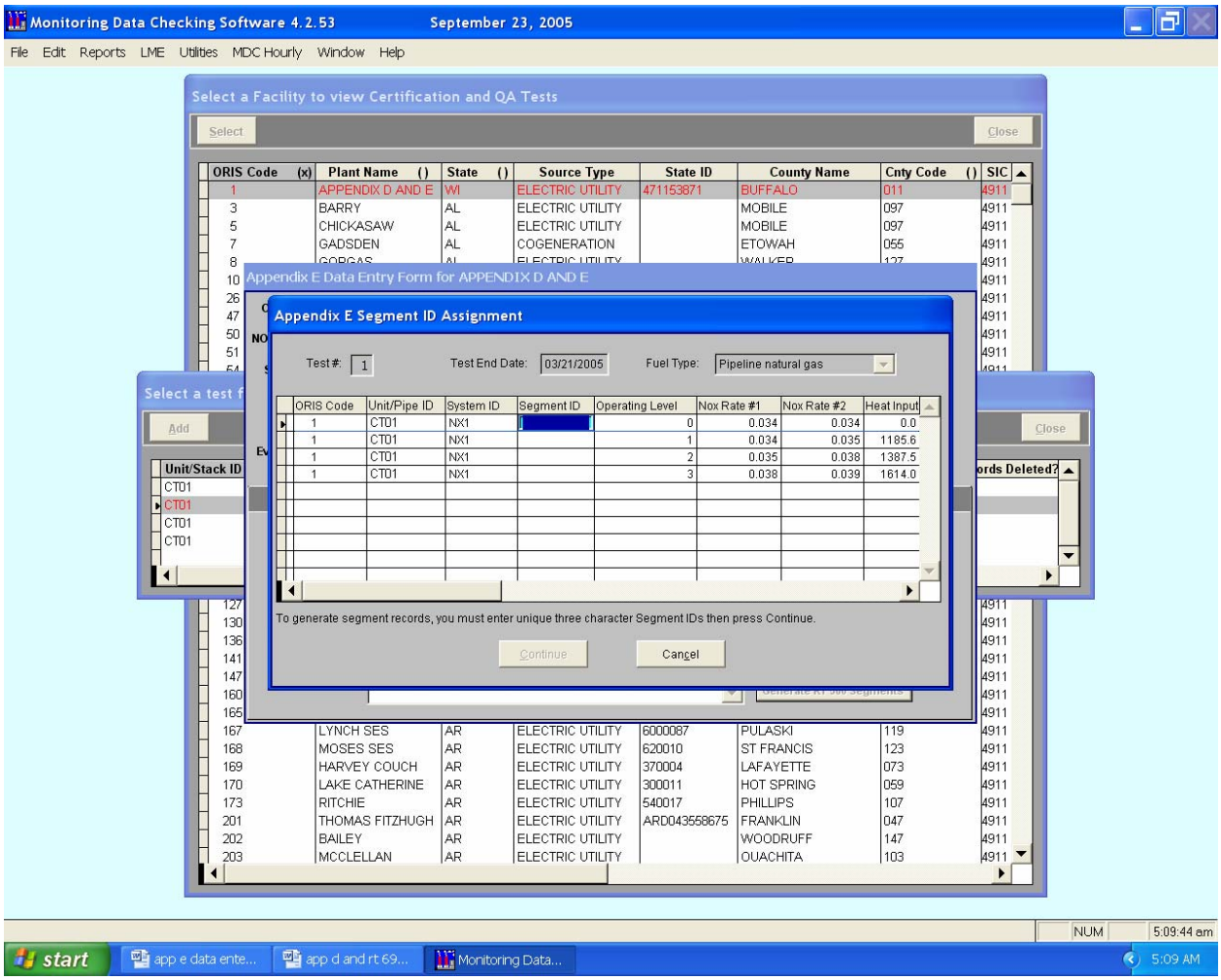
After entering all of the data for system NX1, we repeated the entire data entry process for the Appendix E test of system NX2, the only difference being that we filled out RTs 652 for oil combustion instead of RT 653.



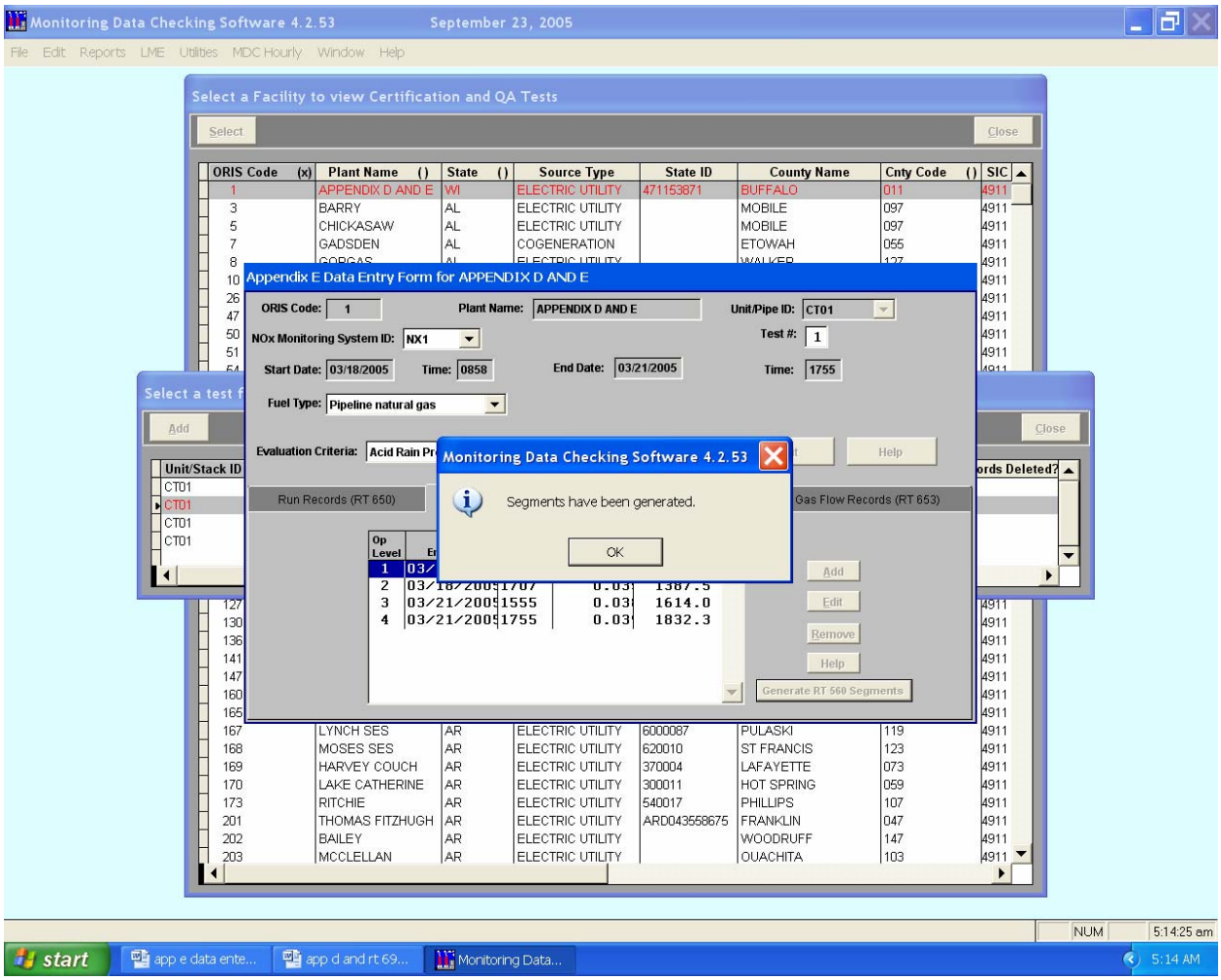
Next, we used MDC to generate the correlation curve segments (RTs 560) for systems NX1 and NX2, in succession. We returned to the Appendix E data entry form and selected the "Results Records (RT 651)" tab. Then, we pressed the "Generate RT 560 Segments" button.



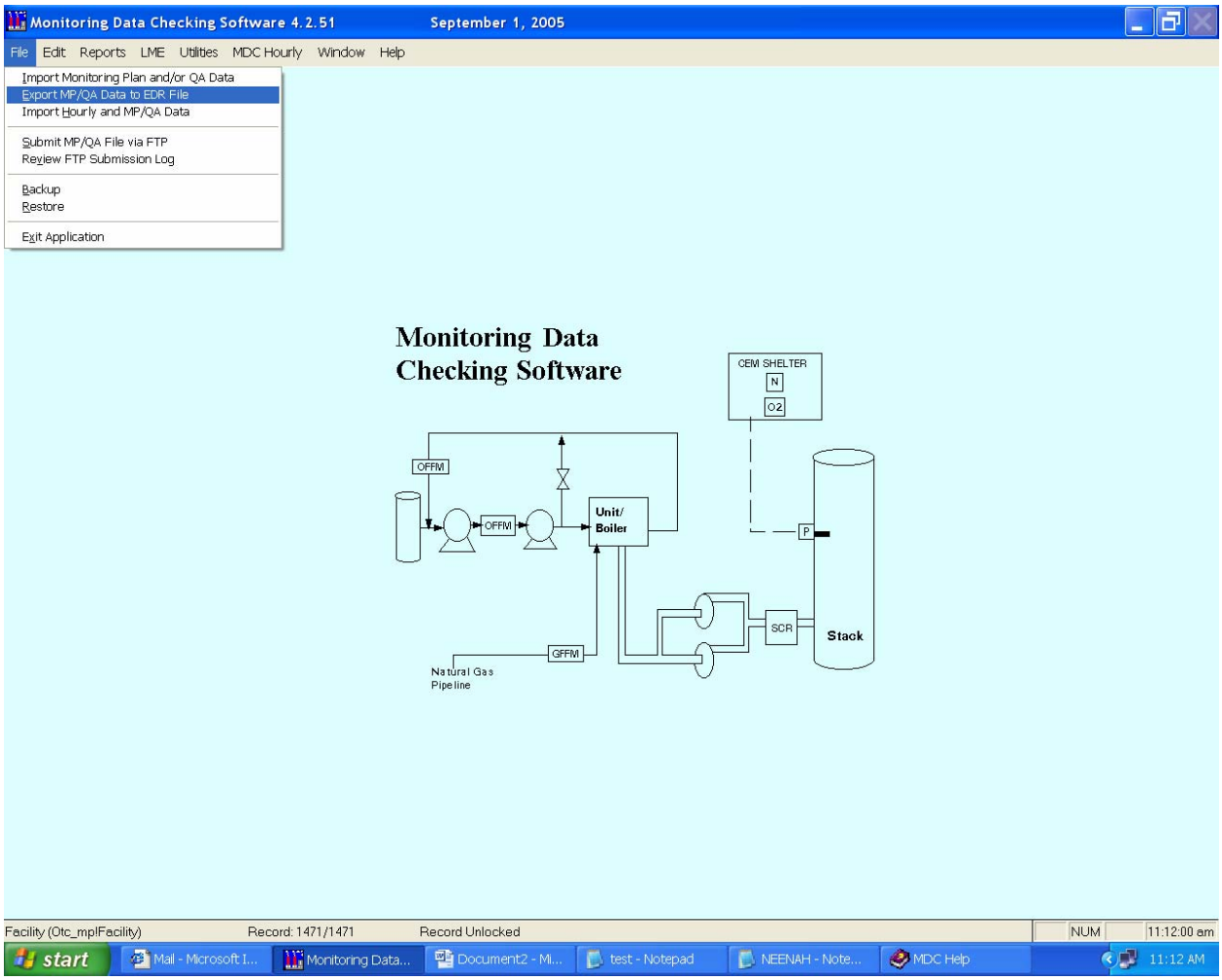
We entered a unique three character ID for each segment and then pressed the "Continue" button.



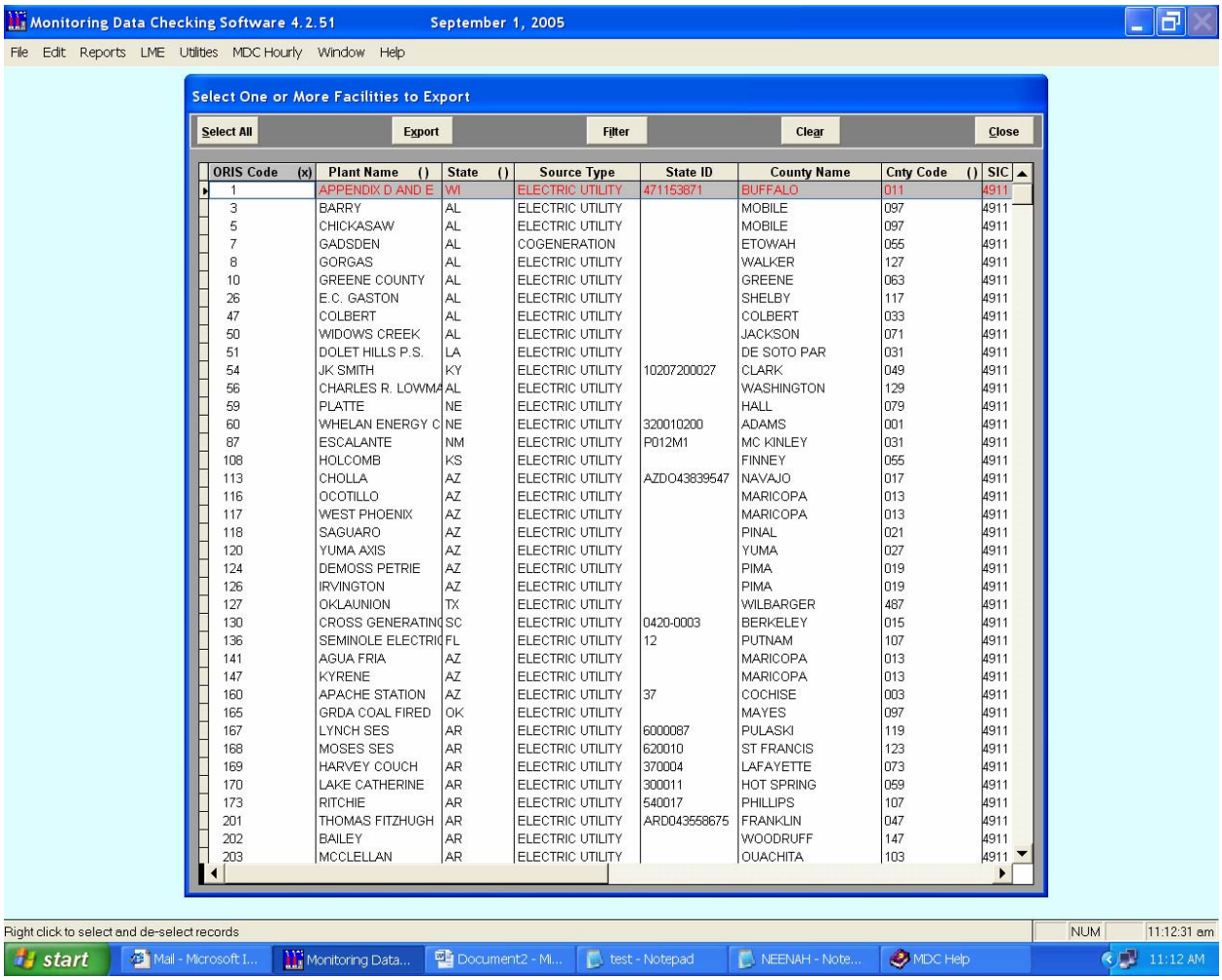
MDC confirmed that the segments were generated.



After entering all of the Appendix E test data into MDC and generating the curve segments, we exported the data into an EDR file. From the "File" menu option, we selected "Export MP/QA Data to EDR File."



We selected the "Appendix D and E" facility by double-clicking on it. (Note: we could also have highlighted the facility using a single right mouse click and then pressing the "Export" button). The "Export Options" screen appeared.



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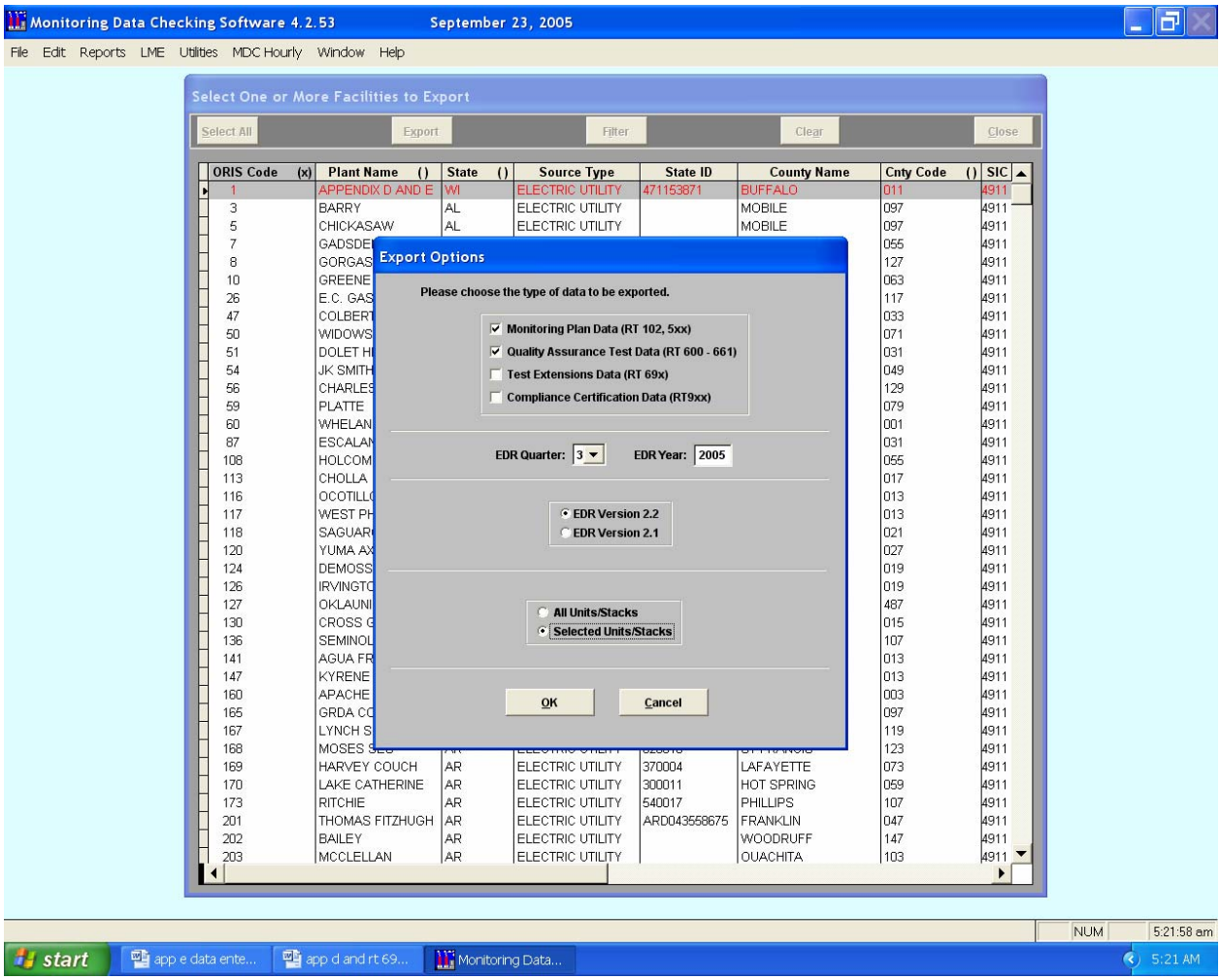
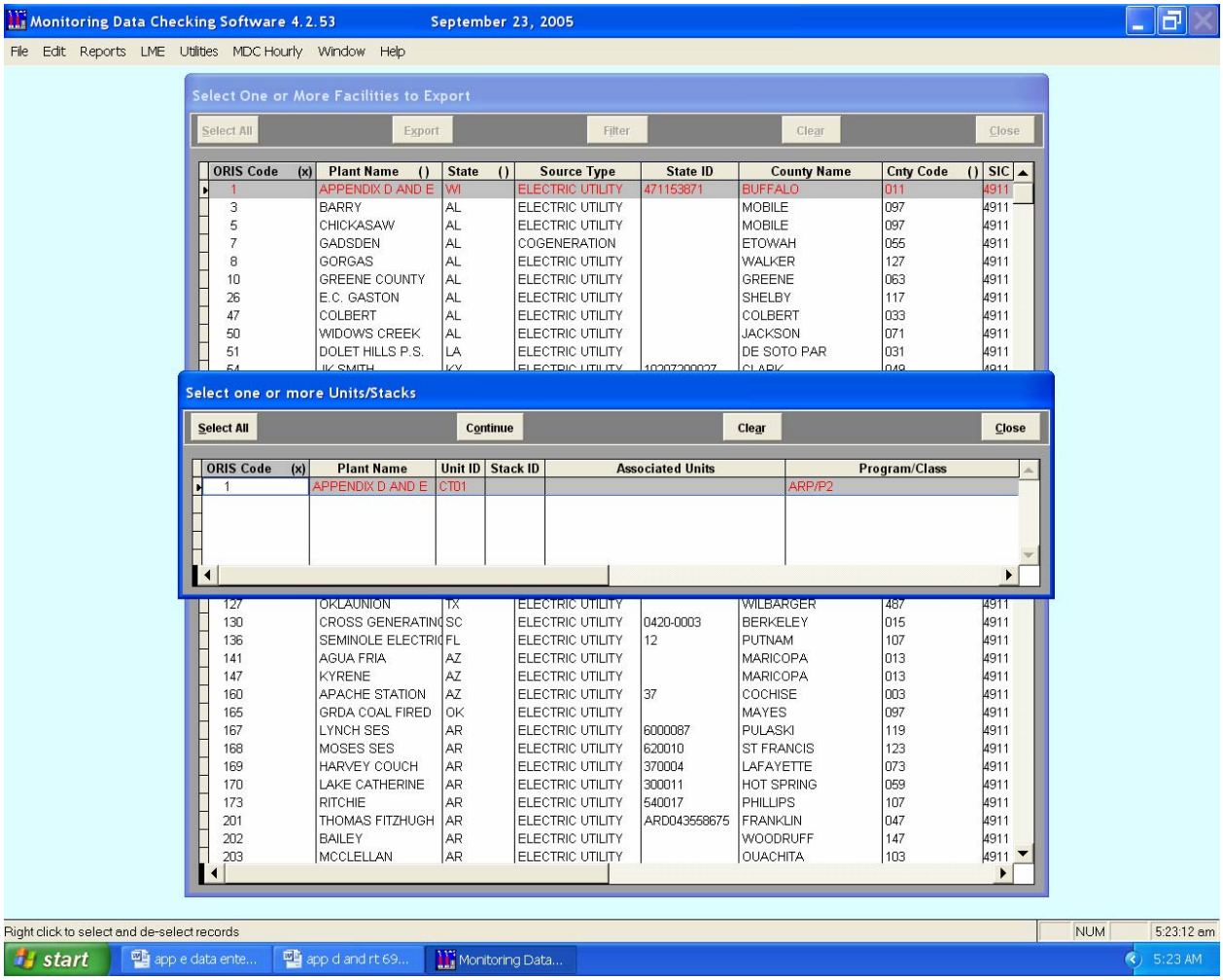
203	MCCLELLAN	AR	ELECTRIC UTILITY		OUACHITA	103	4911

On the "Export Options" screen, we selected both "Monitoring Plan Data" and "Quality Assurance Test Data" to be exported, since we had added both types of information to the MDC database. We identified the current EDR quarter (3rd quarter of 2005) as the quarter and year for which the data should be exported. We then chose the "Selected Units/Stacks" option and pressed "OK" to continue.

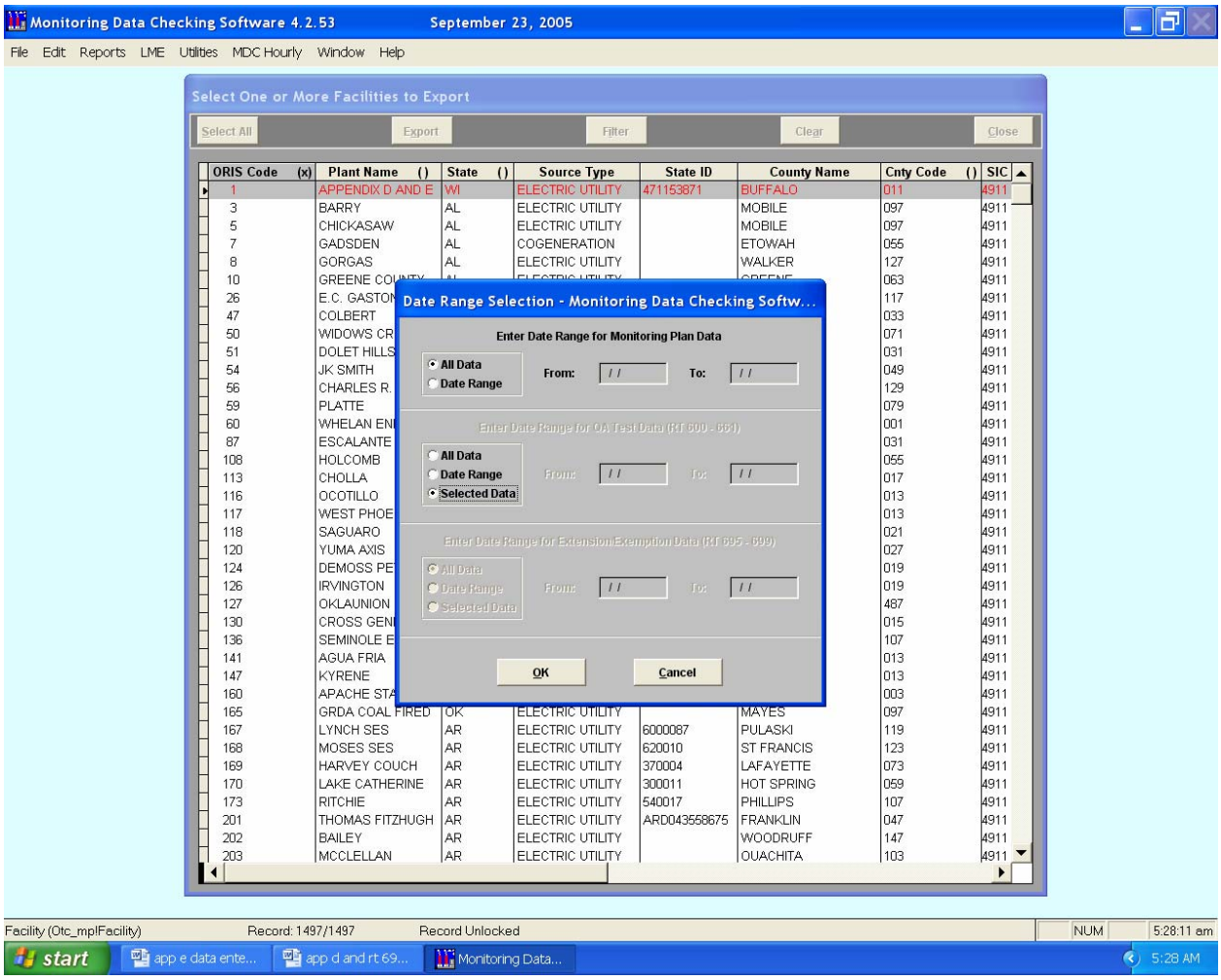


We highlighted Unit CT01 on the "Select One or More Units/Stacks" screen and clicked on "Continue".

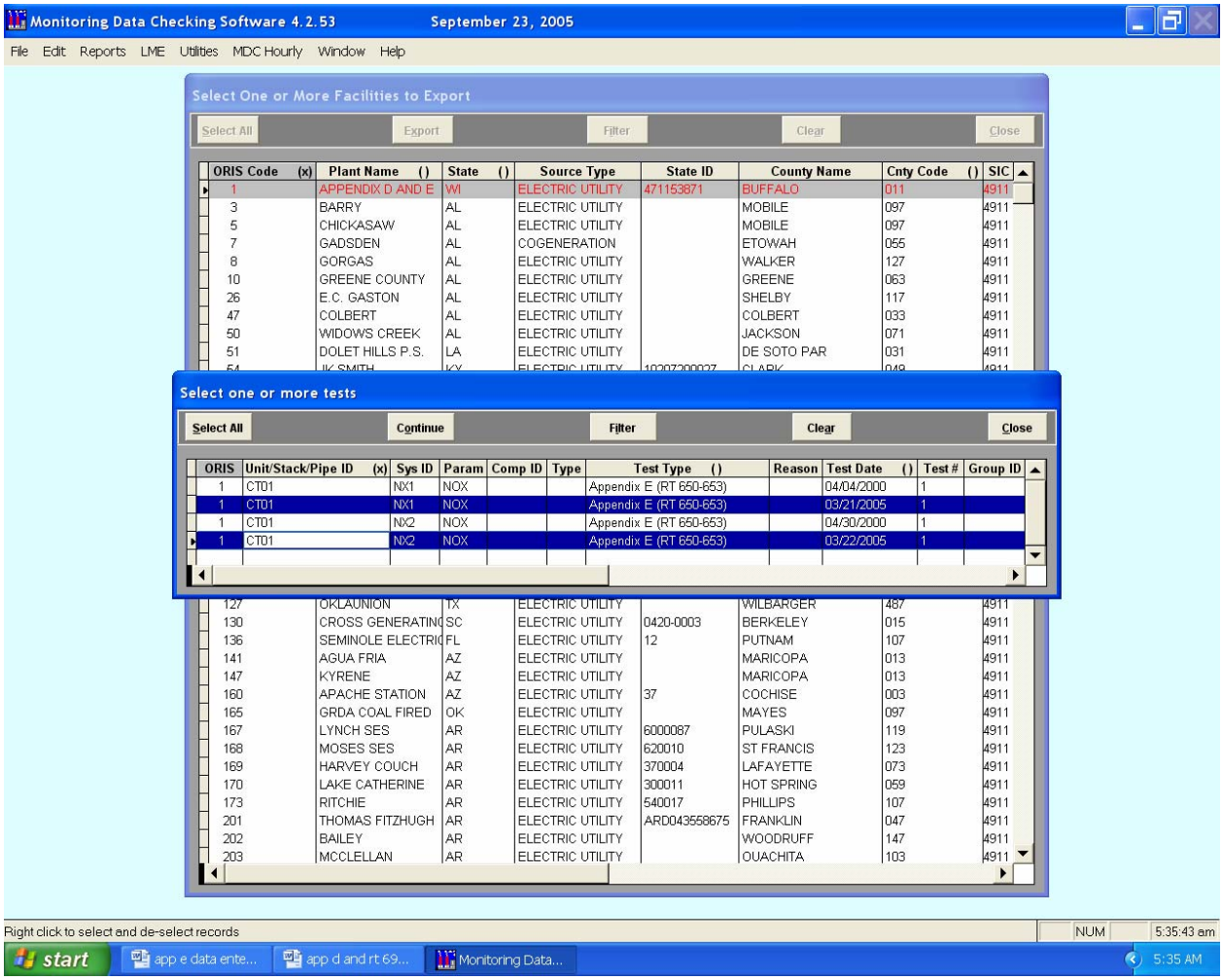


The next screen ("Date Range Selection") gave us choices about which data to export. For monitoring plan (MP) records, we could either have exported all of the MP data in the database or only MP records that were active during a specified date range. For QA test records, we had three choices: (1) export all QA tests in the database; or (2) export all QA tests performed within a specified date range; or (3) export only selected QA tests.

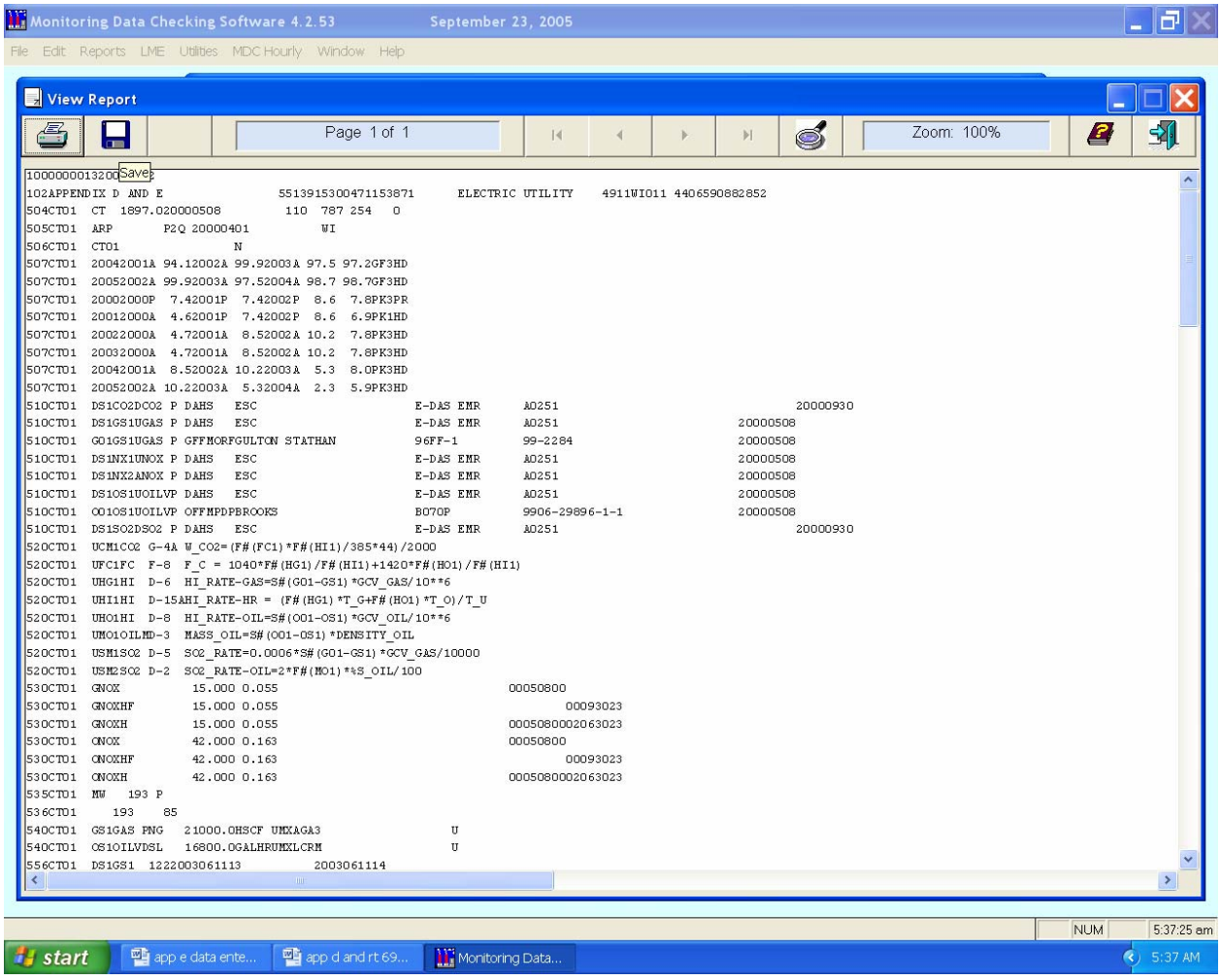
For the monitoring plan data, we chose the "All Data" option and for the QA tests we chose the "Selected Data" option. Because we chose "Selected Data" option for the QA tests, the "Select one or more tests" screen appeared.

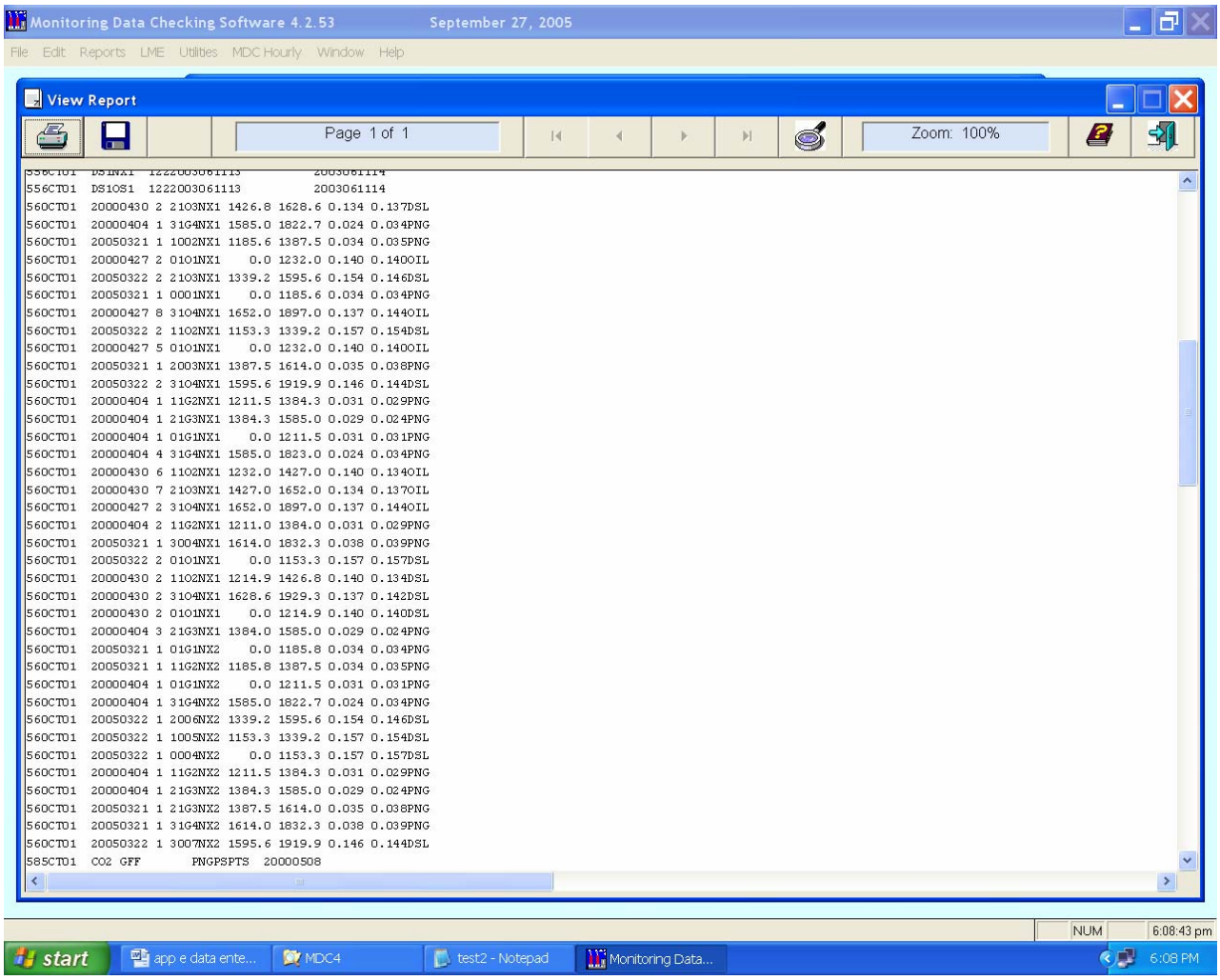


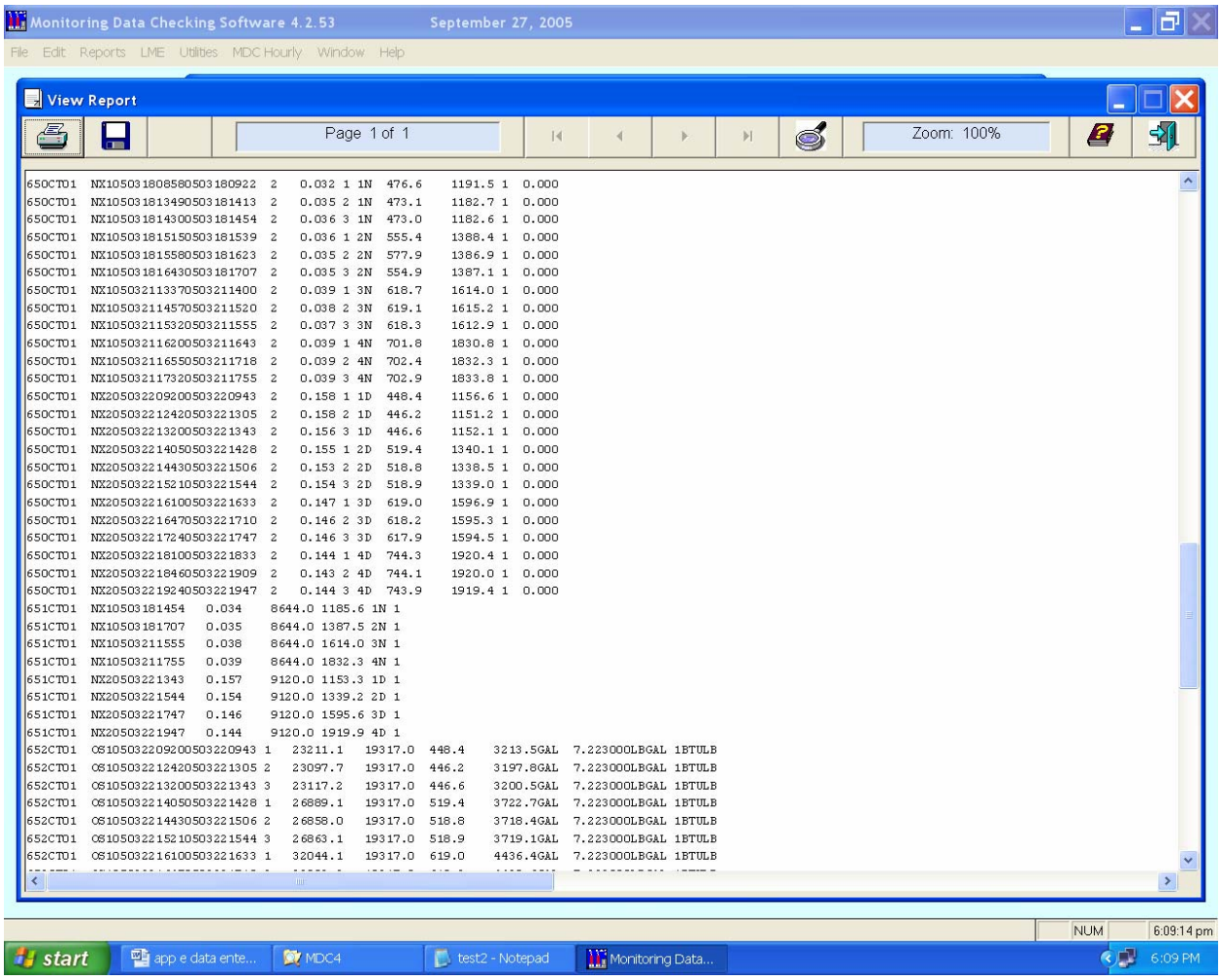
We highlighted the 2005 Appendix E tests of systems NX1 and NX2 by right clicking on each one. Then we pressed "Continue".



The software processed the data into EDR v.2.2 ASCII format, and displayed it in the "View Report" window. The next three screens, respectively, show the beginning of the exported data, the Appendix E correlation curve segments (RTs 560), and a portion of the Appendix E test data (RTs 65X).




Monitoring Data Checking Software 4.2.53 September 27, 2005
File Edit Reports LME Utilities MDC Hourly Window Help
View Report
Page 1 of 1
Zoom: 100%
556CT01 DS1OS1 1222003061113 2003061114
560CT01 20000430 2 2103NX1 1426.8 1628.6 0.134 0.137DSL
560CT01 20000404 1 31G4NX1 1585.0 1822.7 0.024 0.034PNG
560CT01 20050321 1 1002NX1 1185.6 1387.5 0.034 0.035PNG
560CT01 20000427 2 0101NX1 0.0 1232.0 0.140 0.140OIL
560CT01 20050322 2 2103NX1 1339.2 1595.6 0.154 0.146DSL
560CT01 20050321 1 0001NX1 0.0 1185.6 0.034 0.034PNG
560CT01 20000427 8 3104NX1 1652.0 1897.0 0.137 0.144OIL
560CT01 20050322 2 1102NX1 1153.3 1339.2 0.157 0.154DSL
560CT01 20000427 5 0101NX1 0.0 1232.0 0.140 0.140OIL
560CT01 20050321 1 2003NX1 1387.5 1614.0 0.035 0.038PNG
560CT01 20050322 2 3104NX1 1595.6 1919.9 0.146 0.144DSL
560CT01 20000404 1 11G2NX1 1211.5 1384.3 0.031 0.029PNG
560CT01 20000404 1 21G3NX1 1384.3 1585.0 0.029 0.024PNG
560CT01 20000404 1 01G1NX1 0.0 1211.5 0.031 0.031PNG
560CT01 20000404 4 31G4NX1 1585.0 1823.0 0.024 0.034PNG
560CT01 20000430 6 1102NX1 1232.0 1427.0 0.140 0.134OIL
560CT01 20000430 7 2103NX1 1427.0 1652.0 0.134 0.137OIL
560CT01 20000427 2 3104NX1 1652.0 1897.0 0.137 0.144OIL
560CT01 20000404 2 11G2NX1 1211.0 1384.0 0.031 0.029PNG
560CT01 20050321 1 3004NX1 1614.0 1832.3 0.038 0.039PNG
560CT01 20050322 2 0101NX1 0.0 1153.3 0.157 0.157DSL
560CT01 20000430 2 1102NX1 1214.9 1426.8 0.140 0.134DSL
560CT01 20000430 2 3104NX1 1628.6 1929.3 0.137 0.142DSL
560CT01 20000430 2 0101NX1 0.0 1214.9 0.140 0.140DSL
560CT01 20000404 3 21G3NX1 1384.0 1585.0 0.029 0.024PNG
560CT01 20050321 1 01G1NX2 0.0 1185.8 0.034 0.034PNG
560CT01 20050321 1 11G2NX2 1185.8 1387.5 0.034 0.035PNG
560CT01 20000404 1 01G1NX2 0.0 1211.5 0.031 0.031PNG
560CT01 20000404 1 31G4NX2 1585.0 1822.7 0.024 0.034PNG
560CT01 20050322 1 2006NX2 1339.2 1595.6 0.154 0.146DSL
560CT01 20050322 1 1005NX2 1153.3 1339.2 0.157 0.154DSL
560CT01 20050322 1 0004NX2 0.0 1153.3 0.157 0.157DSL
560CT01 20000404 1 11G2NX2 1211.5 1384.3 0.031 0.029PNG
560CT01 20000404 1 21G3NX2 1384.3 1585.0 0.029 0.024PNG
560CT01 20050321 1 21G3NX2 1387.5 1614.0 0.035 0.038PNG
560CT01 20050321 1 31G4NX2 1614.0 1832.3 0.038 0.039PNG
560CT01 20050322 1 3007NX2 1595.6 1919.9 0.146 0.144DSL
585CT01 CO2 GFF PNGPSPTS 20000508
NUM 6:08:43 pm
start app e data ente... MDC4 test2 - Notepad Monitoring Data... 6:08 PM


Monitoring Data Checking Software 4.2.53 September 27, 2005
File Edit Reports LME Utilities MDC Hourly Window Help
View Report
Page 1 of 1
Zoom: 100%
650CT01 NX10503180858050318092 2 0.032 1 1N 476.6 1191.5 1 0.000
650CT01 NX10503181349050318141 3 0.035 2 1N 473.1 1182.7 1 0.000
650CT01 NX10503181430050318145 4 0.036 3 1N 473.0 1182.6 1 0.000
650CT01 NX10503181515050318153 9 2 0.036 1 2N 555.4 1388.4 1 0.000
650CT01 NX10503181558050318162 3 2 0.035 2 2N 577.9 1386.9 1 0.000
650CT01 NX10503181643050318170 7 2 0.035 3 2N 554.9 1387.1 1 0.000
650CT01 NX10503211337050321140 0 2 0.039 1 3N 618.7 1614.0 1 0.000
650CT01 NX10503211457050321152 0 2 0.038 2 3N 619.1 1615.2 1 0.000
650CT01 NX10503211532050321155 5 2 0.037 3 3N 618.3 1612.9 1 0.000
650CT01 NX10503211620050321164 3 2 0.039 1 4N 701.8 1830.8 1 0.000
650CT01 NX10503211655050321171 8 2 0.039 2 4N 702.4 1832.3 1 0.000
650CT01 NX10503211732050321175 5 2 0.039 3 4N 702.9 1833.8 1 0.000
650CT01 NX20503220920050322094 3 2 0.158 1 1D 448.4 1156.6 1 0.000
650CT01 NX20503221242050322130 5 2 0.158 2 1D 446.2 1151.2 1 0.000
650CT01 NX20503221320050322134 3 2 0.156 3 1D 446.6 1152.1 1 0.000
650CT01 NX20503221405050322142 8 2 0.155 1 2D 519.4 1340.1 1 0.000
650CT01 NX20503221443050322150 6 2 0.153 2 2D 518.8 1338.5 1 0.000
650CT01 NX20503221521050322154 4 2 0.154 3 2D 518.9 1339.0 1 0.000
650CT01 NX20503221610050322163 3 2 0.147 1 3D 619.0 1596.9 1 0.000
650CT01 NX20503221647050322171 0 2 0.146 2 3D 618.2 1595.3 1 0.000
650CT01 NX20503221724050322174 7 2 0.146 3 3D 617.9 1594.5 1 0.000
650CT01 NX20503221810050322183 3 2 0.144 1 4D 744.3 1920.4 1 0.000
650CT01 NX20503221846050322190 9 2 0.143 2 4D 744.1 1920.0 1 0.000
650CT01 NX20503221924050322194 7 2 0.144 3 4D 743.9 1919.4 1 0.000
651CT01 NX10503181454 0.034 8644.0 1185.6 1N 1
651CT01 NX10503181707 0.035 8644.0 1387.5 2N 1
651CT01 NX10503211555 0.038 8644.0 1614.0 3N 1
651CT01 NX10503211755 0.039 8644.0 1832.3 4N 1
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652CT01 OS10503220920050322094 3 1 23211.1 19317.0 448.4 3213.5GAL 7.223000LBGAL 1BTULB
652CT01 OS10503221242050322130 5 2 23097.7 19317.0 446.2 3197.8GAL 7.223000LBGAL 1BTULB
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652CT01 OS10503221610050322163 3 1 32044.1 19317.0 619.0 4436.4GAL 7.223000LBGAL 1BTULB
NUM 6:09:14 pm
start app e data ente... MDC4 test2 - Notepad Monitoring Data... 6:09 PM

The software prompted us to provide a filename and location to save the exported file, using a standard File Save window (see below). We saved the file and wrote down the name of it. Finally, we used a text editor to cut and paste the exported data into our 3rd quarter, 2005 EDR and submitted the file to EPA.